

Exhibit 2

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

BADAR KHAN SURI

Petitioner,

v.

DONALD TRUMP, *et al.*,

Respondents.

Case No. 1:25-cv-480

DECLARATION OF EDITH HINSON, ESQ.

I, Edith Hinson, do declare under the penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. My name is Edith Hinson. I am a licensed attorney in good standing in the state of Virginia.
2. I am a Program Director for the Detained Adult Program at Amica Center for Immigrant Rights (“Amica Center”), headquartered in Washington, DC.
3. Amica Center is a Washington, DC-based nonprofit organization dedicated to providing legal services to indigent immigrant adults and children who are detained by Immigration and Customs Enforcement (“ICE”). Amica Center’s Detained Adult Program provides free legal assistance to immigrants detained at, among other facilities, the two ICE detention centers in Virginia: Farmville Detention Center (“Farmville”) and Caroline Detention Facility (“Caroline”), among other services.
4. Through our Universal Representation programs, we have a dedicated direct representation intaking team who identifies residents of Washington, DC and Maryland who are eligible for offers of free representation on a recurring basis. I have reviewed our internal Universal

Representation records and can confirm that between March 16, 2025, and March 22, 2025, our direct representation team identified 18 individuals who are Maryland or DC residents and who were processed for detention at Farmville. Of the 18, three were either deported or released, and one was transferred to Pine Prairie, Louisiana. The rest remain detained at Farmville.

5. I have also reviewed our internal representation records and out of 28 individuals that we represented at Farmville in 2025, two were transferred to two different facilities for ongoing detention during the course of our representation. Prior to their transfer, one person had been at Farmville for several months, and the other person had been at Farmville for over a year. Furthermore, of 10 individuals we have represented at Caroline this year, one was transferred to another detention center after six months.

6. Finally, of 14 Amica Center attorneys surveyed who had represented clients at Caroline and Farmville prior to 2025, 13 responded that they've never had a client transferred from those detention centers within 48 hours of their arrival, and one attorney responded that they couldn't remember.

7. I hereby affirm that the above statements are true and correct to the best of my knowledge.

Executed on April 7, 2025
Washington, DC

Edith Clair Hinson

A handwritten signature in black ink, appearing to read 'E. Hinson', written in a cursive style.