

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 ELIZABETH SCHMELZEL, ESQ.

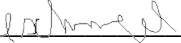
I, Elizabeth Schmelzel, declare under the penalty of perjury, pursuant to 28 U.S.C. §1746, that the following is true and correct:

1. I am licensed to practice in New York and am currently a senior supervising attorney at Legal Aid Justice Center (“LAJC”) in Falls Church, Virginia. In my role, I direct both the Antonin Scalia Law School’s Immigration Field Placement Program and the University of Virginia Immigration Clinic. Across those two programs, I supervise 14 law students working on and litigating immigration cases.
2. I have been practicing immigration law for approximately seven years. Since 2018, I have specialized in immigration law and specifically removal defense. I have represented clients in the Annandale (formerly Arlington), Sterling, and Baltimore immigration courts and at the Board of Immigration Appeals. I have filed merits and amicus briefs before the United States Court of Appeals for the Fourth Circuit. I make this declaration based on my personal knowledge and observations as an immigration practitioner.
3. Throughout my legal career, I have represented individuals in civil immigration detention, including at the Caroline Detention Facility (“Caroline”) and Farmville Detention Center

(“Farmville”). Since January 2025, I have represented eight detained clients in Virginia, all of whom were arrested by ICE in Virginia and detained in either Caroline or Farmville. My colleagues have represented approximately 10 additional Virginia residents since January 2025, all of whom were arrested by ICE in Virginia.

4. In my experience, people arrested by ICE in Virginia are usually processed at the ICE ERO Washington Field Office and, if not released, are detained at Farmville or Caroline. Of the detained Virginia residents LAJC has represented since January 2025, only one is detained outside the state, and he is currently held at the Moshannon Valley Detention Center. Moshannon is approximately 3.5 hours away from our office by car, just 30 minutes more than Farmville, which is 3 hours away from our office by car.
5. I have reviewed Joseph Simon's declaration. In my seven years of practice at high-volume immigration nonprofits, representing approximately 20 clients per year, I have never seen ICE arrest someone in Virginia and move them as far away as Texas in less than 24 hours. In fact, detainees I have represented in Virginia are far more likely to be transferred between Caroline and Farmville than sent outside the state. Such practice reflects some of ICE's own guidance.¹
6. I hereby affirm that the above statements are true and correct to the best of my knowledge.

Executed on April 15, 2025,



Elizabeth Schmelzel, Esq.
Legal Aid Justice Center
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Falls Church, VA 22042

¹ See, e.g., ICE Directive 11064.3, available at: <https://www.ice.gov/doclib/news/releases/2022/11064.3.pdf>