

EXHIBIT A

DECLARATION OF SEAN RIORDAN

Sean Riordan

2102 EVERGLADES PLACE, DAVIS, CA 95616 • (858) 348-7347 • SRIORDAN@ACLU SAN DIEGO.ORG

PROFESSIONAL EXPERIENCE

AMERICAN CIVIL LIBERTIES UNION OF SAN DIEGO & IMPERIAL COUNTIES, SAN DIEGO, CA October 2008 - present
Senior Staff Attorney (2013-present); *Staff Attorney* (2010-2013); *Skadden Fellow* (2008-2010)

Pursue significant civil litigation and other advocacy to protect civil rights and civil liberties, particularly in the fields of immigration and national security. Noteworthy cases and projects include:

- *Lopez-Venegas v. Johnson*: lead counsel in ongoing putative class action challenging the summary expulsion of immigrants in Southern California caused by abuses in the so-called “voluntary return” process.
- *Comprehensive Immigration Reform*: advised ACLU’s Washington Legislative Office and other advocacy organizations on issues related to comprehensive immigration reform, particularly border enforcement issues.
- *Martin v. NCIS*: co-counsel in First Amendment challenge to retaliation against military defense investigator; successfully argued to Ninth Circuit that agent is not entitled to qualified immunity; favorably settled the case.
- *Askins v. DHS*: co-counsel in ongoing First Amendment challenge to the government’s prohibition of unauthorized photography at ports of entry along the U.S.-Mexico border.
- *Franco v. Holder*: co-counsel in ongoing class action that successfully established the right to appointed legal representation for mentally incompetent immigration detainees.
 - Litigation team won 2014 Jack Wasserman Memorial Award for Excellence in Litigation in the Field of Immigration Law from the American Immigration Lawyers’ Association.
- *Annachamy v. Holder*: lead counsel on amicus brief arguing that the “material support for terrorism” provision of the immigration laws contains an exception for conduct done under duress.
- *Fernandez-Crespo v. Baker*: lead counsel in habeas corpus litigation that won the release from detention of a former Cuban political prisoner who the U.S. government wrongly branded a terrorist based on his conviction in a Castro-regime show trial.
- *Centeno-Ortiz v. Cully*: lead counsel in habeas corpus litigation that resulted in the first-ever holding that detained asylum seekers have a right to a hearing to determine whether their detention is justified.
- *Council on American Islamic Relations v. FBI*: co-counsel in lawsuit under the Freedom of Information Act that led to the release of documents showing widespread FBI spying on Muslims’ constitutionally protected religious activities in San Diego.
- *Linguistic Access to Health Care for Refugees*: developed and presented educational materials to various of San Diego’s refugee communities regarding their rights to translation in the health care context.

THE HONORABLE MARC L. GOLDMAN, SANTA ANA, CA
Law Clerk

September 2007 - August 2008

Assisted federal magistrate judge with all legal aspects of docket. Drafted orders and other dispositions on a range of legal matters including post-conviction habeas corpus petitions and prisoner civil rights lawsuits.

THE BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW, NEW YORK, NY
Legal Intern

August - December 2006

Performed research on federal jurisdiction, national security law, constitutional rights and remedies. Drafted pleadings and research memoranda for habeas corpus proceedings on behalf of “enemy combatant” detainees in the United States and Iraq. Assisted in legislative advocacy regarding habeas corpus rights. Translated Arabic documents.

MILBANK, TWEED, HADLEY & MCCLOY LLP, NEW YORK, NY AND LONDON, UK
Summer Associate

May - August 2006

Performed legal research, contractual drafting and documentary analysis for international finance transactions.

THE LEGAL AID FOUNDATION OF LOS ANGELES, LOS ANGELES, CA
Clinical Legal Intern

January - April 2006

Drafted non-profit bylaws and model California ground lease for innovative affordable home ownership mechanism.

THE ACLU OF SOUTHERN CALIFORNIA, LOS ANGELES, CA
Legal Intern

May - July 2005

Performed comprehensive research and legal analysis in asylum, immigration and national security law. Wrote portions of immigration court filings and a habeas corpus petition. Translated Arabic documents.

CENTER FOR FORCED MIGRATION AND REFUGEE STUDIES, CAIRO, EGYPT

July - December 2003

Researcher

Performed outreach and legal and policy advocacy on behalf of East African refugees in Cairo.

VERENIGING HUMANITAIRE PROJEKTEN, CAIRO, EGYPT

January - December 2001

Human Rights Legal Assistant

Performed legal research and factual development for Sudanese internal displacement cases brought before the African Commission on Human and Peoples' Rights.

EDUCATION

UCLA SCHOOL OF LAW, LOS ANGELES, CA

JD, Program in Public Interest Law and Policy, May 2007

Honors: UCLA Moot Court Honors Program, Roscoe Pound Moot Court Semi-Finalist (2006)
White O'Connor Award – top UCLA Moot Court team (2005-2006)

Activities: UCLA Journal of Islamic and Near Eastern Law, Chief Articles Editor
El Centro Legal Clinic, Student Asylum Clinic Co-Coordinator
Dr. Khaled Abou El Fadl, Islamic Law Research Assistant

THE AMERICAN UNIVERSITY IN CAIRO, CAIRO, EGYPT

MA, Arabic Studies, emphasis in Middle Eastern History, June 2002

Honors: Sasakawa Young Leaders Fellowship (full tuition with stipend)

Thesis: *Gender, Law and Power in Medieval Islamic Spain*

WHITTIER COLLEGE, WHITTIER, CA

BA, History, *magna cum laude*, May 2000

Honors: NCAA Academic All-American in Cross Country
President's Award as the Outstanding Scholar-Athlete at Whittier College
Four time All-Conference selection in Track and Field

PUBLICATIONS

The policy at Guantanamo is a failure, SAN DIEGO UNION-TRIBUNE (March 22, 2009)

Military Commissions in America? Domestic Liberty Implications of the Military Commissions Act of 2006, 23 *TOURO L. REV.* 575 (2007)

With Neil R. Brown & Marina Sharpe, *The Insecurity of Eritreans and Ethiopians in Cairo*, 16 *INT. J. OF REFUGEE L.* 661 (2004)

LANGUAGE SKILLS

Arabic: moderate proficiency in Modern Standard and Egyptian colloquial Arabic

Spanish: high proficiency