

Exhibit C

to Declaration of Danielle Quail to
Plaintiffs' Motion to Enforce Court Order

Case No.: 1:20-cv-01104-PLF

Danielle Quail

From: Danielle Quail
Sent: Thursday, July 8, 2021 4:07 PM
To: Margaret Stock
Subject: FW: Update on N-426 process for Zhen Pang

Ma'am:

Just a follow up to Zhen Pang's N-426 situation, Emily Pearson is the civilian employee at OSJA Fort Leonard Wood that I initially spoke to on the phone yesterday about Zhen Pang's N-426 certification request. She stated that they 'used' to have a MAVNI office, then offered to transfer me to someone who could potentially help. She directed me to Mr. Michael, and she specifically told me to ask 'who to contact about getting the N-426 certified'. When I spoke to Mr. Michael on the phone he didn't know what the Form N-426 was, so he asked me to email him exactly what I was asking for (you were CC'ed in that email). Mr. Michael then emailed and stated Emily would be the POC for this.

I received an email from Ms. Pearson this morning to call her, so I called around 8 a.m. (Alaska time) to speak to her. The following was stated in the phone call (this email was drafted this morning after the call): She stated that every time they forward an N-426 to the Battalions, the O-6 in the Battalion refuses to certify them. She also stated that the O-6 Battalion leaders most commonly tell people looking to get their N-426 certified, that they have to wait to get it certified when they arrive at their first duty station. She then stated that the Battalion O-6 thinks that the legal office's O-6 can certify the documents. Ms. Pearson stated the OSJA O-6 does not have that ability.

Again, she reiterated that they used to have a MAVNI office to handle this. She stated that they have a lot of soldiers that fall into this category and (in her opinion) they need to bring the MAVNI office back. She gave me Zhen Pang's Battalion phone number, [REDACTED] because she would like me to contact them directly and ask them myself. I have not tried to call the Battalion directly yet. Can you please advise on what you would like me to say to them if they refuse?

Thank you.

Respectfully,
Danielle

From: Michael, Robert W (Bob) CIV USARMY MCOE (USA) [REDACTED]
Sent: Wednesday, July 7, 2021 1:58 PM
To: Danielle Quail [REDACTED]
Cc: Samuels, Taylor A CPT USARMY MSCOE (USA) [REDACTED] Margaret Stock
[REDACTED] Pearson, Emily R CIV (USA)
[REDACTED]

Subject: RE: [Non-DoD Source] RE: MAVNI soldier needs N-426 certified by COL (O-6), SPC Zhen Pang--assistance requested

Ms. Quail,

Good afternoon. When you contacted me, you asked about locating a Soldier. From looking at this request, this is a Legal Assistance matter that the Soldier has to process. Emily Pearson, CCed, is the POC. Thank you.

Vr

Robert W. Michael
Federal Litigation Division Paralegal
[REDACTED]

From: Danielle Quail [REDACTED]
Sent: Wednesday, July 7, 2021 3:13 PM
To: Michael, Robert W (Bob) CIV USARMY MCOE (USA) [REDACTED]
Cc: Samuels, Taylor A CPT USARMY MSCOE (USA) [REDACTED] Margaret Stock
Subject: [Non-DoD Source] RE: MAVNI soldier needs N-426 certified by COL (O-6), SPC Zhen Pang--assistance requested
Importance: High

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Dear Mr. Michael:

Thank you for your assistance in this matter, it is much appreciated. As mentioned via phone this morning, I am a paralegal with Cascadia Cross Border Law Group and I am assisting Attorney Margaret Stock with obtaining a certified Form N-426, Request for Certification of Military or Naval Service, for our client, SPC Zhen Pang. Please find SPC Zhen Pang's signed Form N-426 attached to this email. Additionally, SPC Pang's SSN can be found on the attached Form N-426. SPC Pang, a MAVNI soldier, shipped to basic training on or around June 21-22, 2021. We have been in contact with his wife who has provided our office with his mailing address at basic training. The mailing address included the following company:

[REDACTED]

We would greatly appreciate any, and all, assistance in forwarding SPC Pang's N-426 to a COL (O-6) that is able to certify his N-426 in a timely manner. Please see the following brief instructions below for the certifying official:

- Page 3, Part 5—must be completely filled out, if it doesn't pertain to SPC Pang, please make sure the N/A box is completed
- Page 3, Part 6—number 1 must be checked
- Page 4, Part 7—please provide any derogatory information, if applicable
- Page 4, Part 8—must be certified by a COL (O-6), please make sure it states COL due to USCIS officers not being familiarized with Army ranks. The signature must also be a 'wet signature'. Unfortunately, digital signatures are not accepted by U.S. Citizenship and Immigration Services.

Again, we appreciate your assistance. Please let me know if you have any further questions in the interim.

Respectfully,
Danielle Quail



Danielle Quail

Paralegal

Cascadia Cross Border Law

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

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<http://www.cascadiawalaska.com/> >

Creating Transparent Borders

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All noncitizens are required to keep USCIS informed of their current address, within ten (10) days of changing the address. For more information, see [Caution-https://egov.uscis.gov/coal/displayCOAInitForm.do](https://egov.uscis.gov/coal/displayCOAInitForm.do) < Caution-<https://egov.uscis.gov/coal/displayCOAInitForm.do> >

During this time of extra caution, Cascadia Cross Border Law Group LLC remains fully operational while cooperating with the Alaska and Anchorage "hunker down" health mandates from our Governor and Mayor. Our team members are working diligently while practicing "social distancing," and our attorneys are immediately available to you by email, phone, and video chat. Our offices are closed to the public, however, so we ask that you deliver original documents to us by a service such as USPS or FedEx. Rest assured we are on your case. Please be safe and stay healthy. Visit our website or Facebook page for updates on immigration and the COVID-19 pandemic.

From: Michael, Robert W (Bob) CIV USARMY MCOE (USA) [REDACTED]

Sent: Wednesday, July 7, 2021 8:18 AM

To: Danielle Quail [REDACTED]

Cc: Samuels, Taylor A CPT USARMY MSCOE (USA) [REDACTED]

Subject: Immigration Law

Ma'am,

Per our discussion, this is me. Please let me know what you need and who you are searching for. It may take a day or two to figure out where the Soldier is located. Thanks.

Vr

Robert W. Michael
Federal Litigation Division Paralegal
[REDACTED]