

EXHIBIT 8

Proposed Search Terms for *IDP et al. v. ICE et al.*, 11 Civ. 6117

Below please find proposed search terms, along with Boolean operators and connectors, for searches of the email, personal and shared drives of the local field offices for ERO and HSI.

Please note the following:

- Terms are not case-sensitive.
- "*" = wildcard
- "w/x" = within x number of words of each other
- "" = quotations denote exact word or phrase.

List of Terms

- arrest* w/3 ("home" or "house" or "apartment" or "trailer" or "fugitive" or "absconder")
- apprehension w/3 ("home" or "house" or "apartment" or "trailer" or "fugitive" or "absconder")
- arrest w/o "worksite" or "work site" or "business" or "employer"
- raid and ("home" or "house" or "apartment" or "trailer" or "fugitive" or "absconder")
- ("home" or "house" or "apartment" or "trailer")and knock*
- residence
- trailer
- "mobile home"
- "home" w/2 "operation"
- driveway
- "permission" w/4 enter or entry
- "consent" w/4 enter or entry
- ask* w/4 enter or entry
- neighbor* w/5 "permission"
- landlord* w/5 "permission"
- bedroom
- sweep
- "FOW" (or other acronym for "Field Operations Worksheet")
- gang and ("home" or "house" or "apartment" or "trailer" or "arrest" or "raid")
- perimeter and ("home" or "house" or "apartment" or "trailer")
- warrant and ("home" or "house" or "apartment" or "trailer")
- "community shield"
- "communityshield"
- "crosscheck"
- "cross check"
- target and ("home" or "house" or "apartment" or "trailer")
- ("child" or "children") and ("home" or "house" or "apartment" or "trailer")
- ("minor" or "minors") and ("home" or "house" or "apartment" or "trailer")

Additional Information Regarding Specific Field Offices:

New York: For the New York Field Offices of HSI and ERO, there is no need to conduct searches for each of these individual terms: “trailer” and “mobile home.”

New Orleans: For the New Orleans Field Offices of HSI and ERO, please also conduct searches for each of these individual terms:

- dekalb
- cherokee
- chilton
- jackson
- jefferson
- shelby
- tuscaloosa
- “fort payne” or “ft. payne,” or “ft payne”
- scottsboro
- collinsville
- hoover