Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

MUHAMMAD IMAM, et al.

Plaintiffs,

v.

MARKWAYNE MULLIN, SECRETARY, U.S. DEPARTMENT OF HOMELAND SECURITY, et al.

Defendants.

Case No. 1:26-MC-00025

Declaration of Caige McCabe

I, Caige McCabe, do hereby state and declare as follows:

1. I am a Digital Forensic Analyst with a U.S. Department of Homeland Security ("DHS" or "the Department") team of certified digital forensic analysts (DFAs). I have held this position since September 2023. I have been an employee of DHS since September 2023. I have been a DFA since 2020.

2. In my capacity as Digital Forensic Analyst, I am responsible for providing technical assistance to DHS Components as part of a team of DFAs employed by DHS Headquarters that assists DHS Components with searches of electronic devices upon request.

3. On October 17, 2026, CBP requested DHS Headquarters technical assistance with gaining access to one phone and one laptop belonging to Plaintiff Muhammad Imam.

4. Based on the duties of my current position, my training, and my experience

as a DFA, I am familiar with and have personal knowledge about DHS efforts to gain access to the contents of Mr. Imam's devices.

5. On October 20, 2026, I received one phone and one laptop, that I understand belong to Mr. Imam, from CBP via hand delivery.

6. Both Mr. Imam's phone and laptop were connected to technology that DHS utilizes when attempting to access the contents of a device.

7. My examination of Mr. Imam's phone was limited to device specifications and high-level file-system structure. [redacted]

8. [redacted] I did not access or view the contents of Mr. Imam's laptop.

9. [redacted]

10. [redacted]

11. I did not access any medical information on Mr. Imam's phone. I did not access any medical information on Mr. Imam's laptop.

12. Mr. Imam's phone and laptop remained in my custody from the time they were delivered by CBP on October 20, 2026 until the time I returned them to CBP on October 21, 2026.

13. I declare, under the penalty of perjury, that the foregoing is true and correct to the best of my information, knowledge, and belief.

Date: ____10/26/2026_____

CAIGE M MCCABE

Digitally signed by CAIGE M MCCABE
Date: 2026.10.26 17:00:13 -04'00'

Caige McCabe
U.S. Department of Homeland Security