

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF ALI ASAEI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Ali Asaei, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. I first came to the United States on September 6, 2013 on an F-1 student visa. I obtained my master's degree in electrical engineering at SUNY – New Paltz in December 2015.

3. I then applied for and was granted F-1 OPT status, which allows me to perform work directly related to my major area of study for twelve months. My OPT status expires in June 2018.
4. Since August 2016, I have been working as a research assistant at the Nathan Kline Research Institute, which is part of the Research Foundation for Mental Hygiene (RFMH).
5. I live in Fort Lee, New Jersey.
6. As a research assistant, I complete MRI image processing of brains to understand brain structure as well as the structure of diseases like Alzheimer's and Parkinson's disease. Our goal is to learn enough about the brain to predict the occurrence of these and other diseases. The funding for this project comes from the National Institute of Health (NIH).
7. In addition to my work as a research assistant, I help write image processing software that has clinical and/or research applications.
8. Outside of my work at RFMH, I have also volunteered with a local refugee organization in Jersey City, New Jersey.
9. I was also recently featured in a New York Times article entitled, "Twitter Adds New Ways to Curb Abuse and Hate Speech,"
https://www.nytimes.com/2016/11/16/technology/twitter-adds-new-ways-to-curb-abuse-and-hate-speech.html?_r=0
10. I last saw my mother and sister in 2014, when they visited me in the United States on B-1 and B-2 tourist visas. I have not seen my brother or father since 2013.

11. My parents and sister have long been planning to visit the United States. I personally petitioned for visas for my family. My parents paid \$160.00 each for their visa applications.
12. Within a few years of applying, they were able to get a nonimmigrant visa appointment at the U.S. Embassy in Dubai. The appointment was scheduled for February 15, 2017.

II. Harm Caused by the January 27, 2017 Executive Order:

13. As a result of the January 27, 2017 Executive Order (EO), the U.S. Embassy in Dubai sent my parents an email on January 31, 2017 notifying them that their visa appointment has been cancelled. My family and I have received no further communication clarifying whether their visa appointment will be rescheduled.
14. My parents are currently unable to travel to the United States to visit me. I am also unable to travel to Iran to visit them due to fear of being prevented from returning to the United States as a visa holder.
15. Under the terms of the EO, it is unlikely that I will be able to extend or apply for new work authorization when my current OPT status expires.
16. If the EO continues to be enforced I will be prevented from seeing my family. As a consequence of not being able to extend or apply for new work authorization, I will likely be forced to quit my job and leave the United States permanently upon the expiration of my OPT status or earlier. This prospect has caused me great mental and emotional distress.

I, Ali Asaei, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 6 day of February, 2017, in Orangeburg, NY.

/s/ Ali Asaei

Ali Asaei

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF SHIVA HISSONG IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Shiva Hissong, hereby declare and state as follows:

1. My name is Shiva Hissong. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I reside in Spokane, Washington. In November 2016 I received authorization to work in the United States but am currently a stay-at-home mother. My husband works as an architect in Spokane, and owns an architecture firm and an advertising agency.

3. I am a citizen of Iran and a Green Card holder (legal permanent resident) of the United States.

4. I am a Muslim and adhere to the religion of Islam.
5. I was a student in Italy from August 2012 until March 2016. I was there on a student visa and earned credits toward my Bachelor's Degree in fashion. While studying in Italy, I met my husband in Rome.
6. After my future husband and I got engaged, I applied for and received a K-1 visa.
7. I entered the United States on this K-1 visa on March 3, 2016.
8. My husband and I were married on April 17, 2016 and hosted a wedding ceremony on August 28, 2016 in Spokane, Washington.
9. My parents reside in Tehran, Iran. My father has been ill with Parkinson's disease for the past ten years, and his condition has significantly deteriorated in the last three to four years.
10. My parents were unable to obtain visas to attend my wedding due to a lack of visa appointments at the United States Embassies in the United Arab Emirates, Armenia, or Turkey.
11. Subsequently, my parents decided that they would try to visit the United States for the birth of their grandson.
12. In October 2016, my parents were able to get a visa appointment at the United States Embassy in Yerevan, Armenia. The interviewing officer informed my parents that they had to undergo an administrative interview that would take approximately three to six months.
13. My son was born on November 28, 2016. My parents were not present for his birth pending their visa applications and administrative process. They have not yet met my son.
14. In light of my father's illness and the extended application process for my parents to obtain a visa to visit the United States, my parents and I made plans to meet in Dubai, United Arab Emirates in March 2017 so that my parents could meet their grandson.

II. Harm Suffered Post January 27, 2017 Executive Order:

15. Prior to my parents completing an administrative interview for their visa applications, President Donald Trump signed an Executive Order on January 27, 2017 (EO) immediately prohibiting the issuance of visas to Iranian citizens, and preventing the entry of Iranian citizens into the United States.

16. Following the signing of the EO, my parents' visas applications are on hold or may have already been denied. The United States Embassy in Yerevan, Armenia has not, to the best of my knowledge, issued any electronic mail or guidelines to my parents with respect to their applications.

17. As a result of the confusion and uncertainty surrounding my parents' visa applications under the terms of the EO, I do not know if my parents will be able to visit the United States while my father is healthy enough to travel.

18. The morning after the EO was signed, the immigration attorney that I had retained advised me that I should not leave the United States due to the EO.

19. As a result of the EO, I became very concerned about my ability to exit and reenter the United States, and decided to cancel my family's visit to the United Arab Emirates in March 2017. My parents will not be able to meet their grandson as originally planned. Given my father's illness, I am concerned about whether he and my mother will ever be able to meet my son and I would not have canceled our visit but for the EO and the resulting confusion about whether or not legal permanent residents like myself will be allowed to travel to and from the United States.

20. In addition, prior to the signing of the EO, my husband and I had purchased plane tickets to visit Amsterdam, the Netherlands. Following the signing of the EO, I became

concerned about my ability to exit and reenter the United States and have subsequently decided not to visit the Netherlands as originally planned.

21. As a result of the confusion and uncertainty surrounding my legal resident privileges under the terms of the EO, I do not know if I will be able to travel outside the United States.

22. I have received no guidance, information, clarity, instruction, or correspondence from the United States government or my attorney concerning the issuance of visas and/or whether my parents' visas will be issued in course or whether it will not be issued under the terms of the January 27 Executive Order.

23. I have received no guidance, information, clarity, instruction, or correspondence from the United States government or my attorney concerning the status of my legal residency privileges under the terms of the January 27 Executive Order.

24. As a result of the confusion and uncertainty surrounding my parents' visa applications under the terms of the January 27 Executive Order, my family and myself have been greatly emotionally distressed about whether my son and/or I will be able to see my parents, especially given the severity of my father's illness.

I, Shiva Hissong, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 0th day of February, 2017, in ~~Sakane~~
WA



Shiva Hissong

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

Civil Action No. _____

**DECLARATION OF OMID MOGHIMI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Omid Moghimi, hereby declare and state as follows:

1. My name is Omid Moghimi. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background

2. I am 28-years-old and currently reside in Enfield, Massachusetts. I am currently employed as a first year resident at Dartmouth-Hitchcock Medical Center in the field of internal medicine. I earned my Medical Degree from Tufts University in Boston, Massachusetts.

3. I am a dual citizen of the United States and Iran. I was born in the United States and also hold Iranian citizenship.

4. My mother, father, and older brother are all United States citizens.
5. I married Dorsa Razi in July 2015. My wife is currently 21-years-old and living in Iran. She has completed two years of her undergraduate studies in mechanical engineering at Tehran University in Karaj, Iran.
6. My wife and I are both Muslim.
7. On or about August 3, 2015, I filled out a form "i-130" and petitioned for an IR1 visa for my wife. My wife dropped out of her undergraduate program in anticipation of moving to the United States.
8. The petition was approved by United States Citizenship and Immigration Service ("USCIS") on or about December 1, 2015 and was sent to the National Visa Center ("NVC") for further processing.
9. On or about January 13, 2016, I received an acknowledgment letter confirming that NVC had received my wife's petition from USCIS and requested we take some further action to prepare for the visa interview process.
10. On or about June 5, 2016, I received a correspondence from NVC acknowledging receipt of documents, however, due to a high volume of petitions being processed, we were advised that NVC required an additional 30 days to review the documents.
11. Forty-six days later, on or about July 21, 2016, I received an e-mail from NVC acknowledging that they have received all of the documentation required, and that my wife's petition had been placed in the queue to be scheduled for an interview with a consular officer who would adjudicate my wife's visa petition.

12. On or about December 29, 2016, I received an e-mail from NVC notifying my wife and I that a visa interview had been scheduled for at the U.S. Embassy or consulate in Abu Dhabi, UAE on February 2, 2017 at 8:00 a.m.

13. In reliance on the visa interview appointment, I purchased flights and made hotel reservations for my wife and mother-in-law to travel from Iran to Abu Dhabi. I paid approximately \$1,500.00 for the flight and hotel reservations. By all indications, my wife's visa would have been adjudicated and issued but for the January 27 Executive Order.

II. Harm Caused by the January 27, 2017 Executive Order:

14. On January 27, 2017, President Trump issued an Executive Order restricting the issuance of visa's to Iranian citizens, and preventing Iranian immigrants and nonimmigrants from entering the United States. Under the terms of the Executive Order, my wife would not be issued a visa and would be prevented from entering the United States.

15. On or about January 28, 2017, the day following the signing of the executive order, I received an email from "asknvc@state.gov" stating the following: "Due to unforeseen circumstances, your interview appointment has been canceled. We will reschedule your immigrant visa interview date and inform you of the new appointment date as soon as we are able. You do not need to take any action at this time. We apologize for any inconvenience this may have caused."

16. On or about January 29, 2017, I received another e-mail stating the following: "Per U.S. Presidential executive order, signed on January 27, 2017, visa issuance to aliens from the countries of Iraq, Iran, Libya, Somalia, Sudan, Syria and Yemen, has been suspended effective immediately until further notification. Your upcoming visa appointment was cancelled in compliance with these new directives. If you are a national or dual-national of one of these

countries, please do not attempt to schedule a visa appointment, pay visa fees at this time, or attend your previously scheduled visa appointment.”

17. To date, I have paid approximately \$500.00 in visa application fees for my wife.

18. As of the date of this affidavit, my wife and mother-in-law are in Abu Dhabi and will be flying back to Tehran, Iran on or about February 3, 2017.

19. I have received no guidance, information, clarity, instruction, or correspondence from the United States government concerning the enforcement of the January 27 Executive Order and/or whether the NVC will reschedule my wife’s visa appointment. I also have no information about whether my wife will be issued an IR1 visa or if she will be allowed to enter the United States. My wife and I are both greatly distressed about what will happen to our family because of the Executive Order. I am faced with a very difficult decision of continuing my residency and being separated from my wife, or withdrawing from my residency and flying to Iran to be with my wife.

20. As a direct result of the uncertainty caused by the EO, I have been extremely anxious, stressed, unable to sleep and eat, depressed, and nervous because I am unclear about whether I will continue to be separated from my wife.

21. I have been checking various internet websites and blogs every day since January 27, 2017 in an attempt to gather further information about the issuance of visas.

22. I am familiar with, have registered for, and participated in, various events and functions organized by the National Iranian American Council (“NIAC”) over the last five years.

23. I am afraid because I fear that the State Department, USCIS, the NCV, and/or the government agencies listed as Defendants will take retaliatory action against me or my wife for participating in this action.

I, Omid Moghimi, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 6 day of February, 2017, in Enfield, NH.

/s/ Omid Moghimi

Omid Moghimi

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

Civil Action No. _____

**DECLARATION OF JANE DOE #1 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #1, hereby declare and state as follows:

1. My name is Jane Doe #1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am 28-years-old and currently reside in San Diego, California. I am employed with the City of San Diego. I have my Master's Degree in city planning from San Diego State University.

3. I am a dual citizen of the United States and Iran.

4. I am a Muslim and adhere to the religion of Islam.

5. My family sold all of their belongings and assets in Iran and immigrated to the United States in 2001. I was 11-years-old at the time and moved with my mother, father, and sister.

6. It took approximately twelve (12) years for my family to be approved to become Green Card holders (legal permanent residents). My family has continued to live in the United States since 2001 and myself, my mother, my father, and my sister are all United States citizens.

7. Both of my parents are small business owners in the United States.

8. In 2013, I met my fiancé in San Diego while he was visiting the United States on a tourist visa. He is 29-years-old with a Master's Degree in engineering from Sharif University of Technology in Tehran, Iran.

9. After traveling to Iran several times to visit my fiancé, we got engaged to be married in October of 2015. Thereafter, we immediately engaged the services of a Los Angeles, California immigration attorney in December of 2015 to assist us with the visa process for my fiancé to move to the United States.

10. My fiancé's petition for K-1 visa was submitted in February 2016 and was approved by April of 2016. The case was created by May of 2016.

11. In October 2016, my fiancé and I traveled to Abu Dhabi for the immigrant visa interview. Thereafter, the visa was adjudicated and approved, and we were advised that "additional administrative processing" could take up to six months.

II. Harm Caused by the January 27, 2017 Executive Order:

12. I have personally checked the U.S. State Department website every day since October 2016 for status updates on my fiancé's visa. The last entry was updated on January 10, 2017 containing general information.

13. Subsequent to the approval in October of 2016, but prior to my fiancé's visa being adjudicated and issued, President Trump signed an Executive Order on January 27, 2017 immediately prohibiting the issuance of visas to Iranian citizens, and preventing the entry of Iranian citizens into the United States.

14. To date, I have paid approximately \$5,000.00 in travel expenses to Abu Dhabi for my fiancé's immigrant visa interview. I have also paid approximately \$3,500.00 in legal fees.

15. Prior to the January 27 Executive Order, my fiancé and I had been planning an extravagant wedding ceremony in the United States that was scheduled for 2018.

16. To date, I have spent hundreds of hours planning my wedding and I have executed contracts and paid \$2,500.00 as a down payment to secure a wedding venue. An additional \$2,500.00 payment will become due in May of 2017. As a result of the confusion and uncertainty surrounding my fiancé's visa under the terms of the January 27 Executive Order, I don't know if I should continue to make payments to the wedding venue and/or otherwise continue planning our wedding ceremony.

17. I have received no guidance, information, clarity, instruction, or correspondence from the United States government or my attorney concerning the issuance of visas and/or whether my fiancé's approved visa will be issued in course or whether it will not be issued under the terms of the January 27 Executive Order.

18. I have been checking various internet websites and blogs every day since January 27, 2017 in an attempt to gather further information about the issuance of visas.

19. As a direct result of the uncertainty caused by the EO, I have been extremely anxious, stressed, unable to sleep and eat, and nervous because I am unclear about whether I will be able to be reunited with my fiancé and get married.

20. I have joined this lawsuit as an anonymous Plaintiff because I am afraid that the State Department, USCIS, the NCV, and/or the government agencies listed as Defendants will take retaliatory action against me or my fiancé for participating in this action.

I, Jane Doe #1, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5 day of February, 2017, in San Diego, CA.

/s/ Jane Doe #1
Jane Doe #1

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

Civil Action No. _____

**DECLARATION OF JANE DOE #2 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #2, hereby declare and state as follows:

1. My name is Jane Doe #2. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am 32-years-old and currently reside in Phoenix, Arizona. I am currently employed as a database administrator for FedEx Services where I have worked for approximately five years. I have my Master's in Business Information Systems from the University of Memphis.

3. I am a dual citizen of the United States and Iran. I became a citizen of the United States on or about 2008.

4. I immigrated to the United States in December of 2007, with my mother, father, both of whom are also United States citizens.

5. In 2016, I petitioned for a student visa on behalf of my sister, who is currently in Iran. My sister is 35-years-old, and is in the last semester of her Master's program for architecture. She is a synchronized swimmer who has coached for the Fédération Internationale de Natation ("FINA"), the international governing body for competitive swimming and aquatics. My sister is also an artist that frequently paints and does intricate mosaic work.

6. I engaged the services of an immigration attorney in Los Angeles, California to assist my sister with the visa issuance process. To date, I have paid approximately \$2,000.00 in attorneys' fees.

7. My mother, a dual citizen of Iran and the United States, traveled to Iran approximately two years ago to be with my sister. My father, also a dual citizen of Iran and the United States citizen, traveled to Iran approximately seven months ago to assist my sister and mother. My father was recently diagnosed with Stage 1-2 cancer. My parents are both retired.

8. Approximately six months ago, I was informed that my sister's petition had been approved by the United States Citizenship and Immigration Service (USCIS) and the National Visa Center (NVC), and an immigrant visa interview was scheduled for her in Abu Dhabi.

9. After her initial visa interview in Abu Dhabi, my sister's visa was denied by the consular officer due to a clerical error between the NVC and the immigration office in Abu Dhabi. She was forced to fly back to Iran, and return back to Abu Dhabi several months later after the clerical error had been corrected.

10. My sister traveled back to Abu Dhabi a second time, underwent a second full medical examination, and her visa was adjudicated and issued approximately four months ago.

Thus, she currently holds a valid F-11 visa that should allow her to travel to the United States. Her visa is set to expire in March 2017.

11. I immediately began planning for my sister to make her first entry into the United States in Phoenix, Arizona, where I currently reside, to help her get acclimated and assist her with completing her immigration documents. My sister intended to complete her architecture studies in the United States.

12. I purchased a flight for my sister to depart Iran on or about February 15, 2017 for approximately \$1,000.00. My mother and father also purchased tickets to return back to the United States on or about February 16, 2017.

II. Harm Caused by the January 27, 2017 Executive Order:

13. On January 27, 2017, President Trump issued an Executive Order restricting the issuance of visa's to Iranian citizens, and preventing Iranian immigrants and nonimmigrants from entering the United States. Under the terms of the Executive Order, my sister will be prevented from entering the United States.

14. Upon information and belief, due to her status as a visa-holder, my sister will be prevented from boarding flights departing Iran and/or will be prevented from entering the United States.

15. To date, I have paid approximately \$6,000.00 to \$7,000.00 for visa-related expenses for my sister. As a direct result of the uncertainty caused by the EO, I have been extremely anxious, stressed, unable to sleep and eat, and nervous because I am unclear about whether I will be able to see my sister.

16. I have received no guidance, information, clarity, instruction, or correspondence from the United States government or my attorney concerning the enforcement of the January 27

Executive Order and/or whether my sister will be prevented from leaving Iran or entering the United States.

17. I have been checking various internet websites and blogs every day since January 27, 2017 in an attempt to gather further information about the issuance of visas. I have also contacted the National Iranian American Council (NIAC) and checked their website to get guidance and gather more information about the Executive Order.

18. As a direct result of the uncertainty caused by the EO, I have been extremely anxious, stressed, unable to sleep and eat, and nervous because I am unclear about whether I will be able to see my sister.

19. I am familiar with, have registered for, and participated in, a "virtual protest" organized by NIAC in an effort to petition members of Congress for legislative relief from the negative effects and consequences of the January 27 Executive Order on Iranian Americans.

20. I have joined this lawsuit as an anonymous Plaintiff because I am afraid that the State Department, USCIS, the NCV, and/or the government agencies listed as Defendants will take retaliatory action against my family for participating in this action.

I, Jane Doe #2, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5 day of February, 2017, in Phoenix, AZ.

/s/ Jane Doe #2

Jane Doe #2

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

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Donald J. Trump, President of the United States,)
et al.)

Defendants.)

Civil Action No. _____

**DECLARATION OF JANE DOE #3 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #3, hereby declare and state as follows:

1. My name is Jane Doe #3. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am 39-years-old and currently reside in Irvine, California. I am currently employed as a realtor with HomeSmart/Evergreen Realty. I have my Bachelor's Degree from Azad University in Iran in the field of English translation.

3. I am a dual citizen of the United States and Iran.

4. I immigrated to the United States in March 1999 on a K1 visa after my fiancé at the time, a United States citizen, submitted a petition on my behalf. I became a United States citizen in December 2003.

5. I have no other family living in the United States. Both my brother and I are Muslim by birth.

6. In December 2003, immediately after I became a United States citizen, I petitioned for an F-4 immigrant visa on behalf of my brother. My brother is 34-years-old. He received his Bachelor's Degree from Azad University in Iran and has completed some coursework towards his Master's Degree in economics.

7. Six years later, we received a notification from the United States Citizenship and Immigration Service ("USCIS") that the petition had been approved and sent to the National Visa Center ("NVC") for further processing and scheduling of the immigrant visa interview.

8. My brother flew to Abu Dhabi for his scheduled visa interview on or about December 16, 2016. The petition was adjudicated and his visa was approved and issued on or about December 19, 2016. My brother's visa is set to expire on June 19, 2017.

9. My brother was so excited about his visa and the opportunity to immigrate to the United States that he sent me a picture of himself kissing the American flag t-shirt he had worn to the visa interview. He immediately returned his rental apartment in Iran and began living with a friend in preparation of moving to the United States.

10. I purchased a flight for my brother on Turkish Airlines for approximately \$670.00 to depart on March 5, 2017.

II. Harm Caused by the January 27, 2017 Executive Order:

11. On January 27, 2017, President Trump issued an Executive Order restricting the issuance of visa's to Iranian citizens, and preventing Iranian immigrants and nonimmigrants from entering the United States. Under the terms of the Executive Order, my brother and sister-in-law would be prevented from entering the United States.

12. I immediately purchased a flight for my brother to depart immediately on an Etihad Airways flight departing Iran at approximately 1:30 a.m. on or about January 28, 2017, the day following the signing of the executive order. I paid approximately \$850.00 to purchase the flight, which had a layover in Abu Dhabi.

13. Upon arriving in Abu Dhabi, my brother and fellow visa holders and Green Card holders traveling to the United States were informed that they were the first group being detained under the terms of the newly issued EO. My brother and fellow passengers were escorted to a room where they were detained for over 19 hours. Their passports, visas, green cards, and "welcome packages" were confiscated.

14. Officials called each passenger one-by-one and showed them the text of the EO, and stated that their visa, passport, green card, and/or welcome package is being returned to them, but they will have to make travel arrangements to return back to Iran. They were also told to get in contact with the United States Embassy in about three months for any updates.

15. In sum, I have paid approximately \$5,000.00 and spent hundreds of hours to secure the visa for my brother, whom I have not seen in over a year. My brother's experiences as a result of the January 27 Executive Order have caused me and my family great financial and emotional harm, which we will continue to suffer if my brother is unable to join me in the United States.

16. I have received no guidance, information, clarity, instruction, or correspondence from the United States government concerning the enforcement of the January 27 Executive Order and/or whether my brother will be prevented from leaving Iran or entering the United States.

17. I have called various airlines in an attempt to gather more information, to no avail.

18. I have been checking various internet websites and blogs every day since January 27, 2017 in an attempt to gather further information about the issuance of visas. I have also been in contact with the National Iranian American Council ("NIAC") to try to gather more information or clarification and have been receiving frequent emails from them containing information about the EO.

19. I have been very depressed since the passing of my mother last year, and the only thing I had to look forward to was being reunited with my only brother. As a direct result of the uncertainty caused by the EO, I have been extremely anxious, stressed, unable to sleep and eat, and nervous because I am unclear about whether I will remain separated from my brother.

20. My brother has told me that this experience has been as shocking and as painful for him as the death of our mother a year ago.

21. I have joined this lawsuit as an anonymous Plaintiff because I am afraid that the State Department, USCIS, the NCV, and/or the government agencies listed as Defendants will take retaliatory action against me or my brother for participating in this action.

I, Jane Doe #3, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 4 day of February, 2017, in Irvine, CA.

/s/ Jane Doe #3
Jane Doe #3

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

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Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JANE DOE #4 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #4, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I currently reside in San Francisco, California. I am employed full time with an architectural firm.

3. I am an Iranian citizen and was granted asylum in the United States in June 2016. I am currently in the process of my Green Card. I am a member of the Erfran-e-Halgheh, also referred to as the Circle of Mysticism. I originally entered the United States with a student visa. I applied for asylum in the United States approximately three and a half years ago because I

feared religious persecution in Iran. Members of my spiritual group have recently been killed by Iranian officials and I am unable to return to Iran.

4. I have lived in the United States since fleeing Iran in 2013. My parents still live in Iran and were planning to visit me this year. They have applied for tourist visas and were making travel arrangements. I was also planning to travel this year to Amsterdam to visit some friends who are currently living in Europe. My friends will be returning to Iran later this year, and when that happens I will be unable to see them because I cannot return to Iran.

II. Harm Suffered Post January 27, 2017 Executive Order:

5. On January 27, 2017, President Trump issued an Executive Order restricting the issuance of visas to Iranian citizens, and preventing Iranian immigrants and nonimmigrants from entering the United States. Under the terms of the Executive Order, I am no longer able to leave the United States because if I do I fear that I will not be allowed to return to the United States. I have been instructed by my immigration attorney not to travel outside of the United States because of the January 27 Executive Order.

6. The Executive Order has also forced my parents to cancel their plans to visit me in the United States. My parents will no longer be able to obtain a tourist visa and I will remain separated from my family.

7. I do not have any family in the United States; all of my family is in Iran. I am close to my family and the physical separation is very emotionally and mentally difficult for me.

8. I have received no guidance, information, clarity, instruction, or correspondence from the United States government concerning the enforcement of the January 27 Executive Order and/or whether the Executive Order will impact my pending application for a Green Card.

9. I am afraid that the State Department or other branches of the federal government will take retaliatory action against me for being a party to this action. I am especially concerned about retaliatory actions impacting my immigration status as I am still in the process for applying for my Green Card.

I, Jane Doe #4, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 6 day of February, 2017, in San Francisco, CA.

/s/ Jane Doe #4
Jane Doe #4

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JANE DOE #5 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #5, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. My family and I are currently located in Turkey while we await safe passage to the United States as refugees who have been accepted to the US Government's Refugee Admissions Program. We cannot return to Iran. Approximately three years ago my brother, sister, mother, and I fled Iran due to fears of political persecution. We

applied to be admitted to the United States as refugees and were approved by the U.S. Government to enter the United States under the admissions program.

3. The Jewish Family Services organization, an affiliate of HIAS, has made arrangements to assist my family and I upon our arrival in the United States and is helping us find a place to live in Seattle, Washington.

4. The International Organization for Migration (IOM), which works with the U.S. Government to transport approved refugees to the United States, had provided me and my family members valid visas to enable us to travel to the United States. We were scheduled to fly from Turkey to Seattle, Washington on January 30, 2017. Our travel was not possible because of President Trump's January 27, 2017 Executive Order.

II. Harm Suffered Post January 27, 2017 Executive Order:

5. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

6. As a result of the EO, my family and I were not allowed to fly to the United States on January 30, 2017. We are currently still stranded in Turkey. The IOM has booked a new flight for us to travel to the United States on Wednesday, February 8, 2017. I am hoping we can go. However, due to the uncertainty surrounding the status of the EO and its enforcement, my family and I fear that we will not be allowed to travel to the United States on February 8. We are greatly concerned that the travel ban for Iranian visa holders such as ourselves will be reinstated by this time, and thus we will remain stranded in Istanbul. We have been in contact with an attorney from the Iranian American Bar Association who is helping us to try and find an earlier flight.

7. The EO has caused great turmoil and distress for me and my family. My family members and I have been waiting years to be approved to enter the United States. We were distraught and very upset to learn that our travel had been canceled as a result of the EO. It shattered our hopes for starting our new life in the United States.

8. My family and I have limited economic means and were counting on the ability to soon be able to support ourselves by working in the United States. After we were unable to travel on January 30th, we were forced to stay with an acquaintance located about 6 hours outside of Istanbul and 3 hours outside of Ankara, and slept all four adults together in one room together. The IABA made arrangements for my family and I travel to Istanbul and stay in a hotel while we await safe passage to the United States.

9. I fear that the U.S. government will take retaliatory action against my family and I for being a party to this action and that our involvement will negatively impact our status in the Refugee Admissions Program. I also fear that the Iranian government will learn about my involvement in this legal action and retaliate against my father who is still in Iran.

I, Jane Doe #5, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Istanbul, Turkey.

/s/ Jane Doe #5

Jane Doe #5

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

Civil Action No. _____

**DECLARATION OF JANE DOE #6 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #6, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. My family and I are currently located in Turkey while we await safe passage to the United States as refugees who have been accepted to the US Government's Refugee Admissions Program. We cannot return to Iran. Approximately three years ago my brother, sister, mother, and I fled Iran due to fears of political persecution. We

applied to be admitted to the United States as refugees and were approved by the U.S. Government to enter the United States under the admissions program.

3. The Jewish Family Services organization, an affiliate of HIAS, has made arrangements to assist my family and I upon our arrival in the United States and is helping us find a place to live in Seattle, Washington.

4. The International Organization for Migration (IOM), which works with the U.S. Government to transport approved refugees to the United States, had provided me and my family members valid visas to enable us to travel to the United States. We were scheduled to fly from Turkey to Seattle, Washington on January 30, 2017. Our travel was not possible because of President Trump's January 27, 2017 Executive Order.

II. Harm Suffered Post January 27, 2017 Executive Order:

5. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

6. As a result of the EO, my family and I were not allowed to fly to the United States on January 30, 2017. We are currently still stranded in Turkey. The IOM has booked a new flight for us to travel to the United States on Wednesday, February 8, 2017. I am hoping we can go. However, due to the uncertainty surrounding the status of the EO and its enforcement, my family and I fear that we will not be allowed to travel to the United States on February 8. We are greatly concerned that the travel ban for Iranian visa holders such as ourselves will be reinstated by this time, and thus we will remain stranded in Istanbul. We have been in contact with an attorney from the Iranian American Bar Association who is helping us to try and find an earlier flight.

7. The EO has caused great turmoil and distress for me and my family. My family members and I have been waiting years to be approved to enter the United States. We were distraught and very upset to learn that our travel had been canceled as a result of the EO. It shattered our hopes for starting our new life in the United States.

8. My family and I have limited economic means and were counting on the ability to soon be able to support ourselves by working in the United States. After we were unable to travel on January 30th, we were forced to stay with an acquaintance located about 6 hours outside of Istanbul and 3 hours outside of Ankara, and slept all four adults together in one room together. The IABA made arrangements for my family and I travel to Istanbul and stay in a hotel while we await safe passage to the United States.

9. I fear that the U.S. government will take retaliatory action against my family and I for being a party to this action and that our involvement will negatively impact our status in the Refugee Admissions Program. I also fear that the Iranian government will learn about my involvement in this legal action and retaliate against my father who is still in Iran.

I, Jane Doe #6, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Istanbul, Turkey.

/s/ Jane Doe #6
Jane Doe #6

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JANE DOE #7 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #7, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. My family and I are currently located in Turkey while we await safe passage to the United States as refugees who have been accepted to the US Government's Refugee Admissions Program. We cannot return to Iran. Approximately three years ago my son, two daughters, and I fled Iran due to fears of political persecution. We

applied to be admitted to the United States as refugees and were approved by the U.S. Government to enter the United States under the admissions program.

3. The Jewish Family Services organization, an affiliate of HIAS, has made arrangements to assist my family and I upon our arrival in the United States and is helping us find a place to live in Seattle, Washington.

4. The International Organization for Migration (IOM), which works with the U.S. Government to transport approved refugees to the United States, had provided me and my family members valid visas to enable us to travel to the United States. We were scheduled to fly from Turkey to Seattle, Washington on January 30, 2017. Our travel was not possible because of President Trump's January 27, 2017 Executive Order.

II. Harm Suffered Post January 27, 2017 Executive Order:

5. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

6. As a result of the EO, my family and I were not allowed to fly to the United States on January 30, 2017. We are currently still stranded in Turkey. The IOM has booked a new flight for us to travel to the United States on Wednesday, February 8, 2017. I am hoping we can go. However, due to the uncertainty surrounding the status of the EO and its enforcement, my family and I fear that we will not be allowed to travel to the United States on February 8. We are greatly concerned that the travel ban for Iranian visa holders such as ourselves will be reinstated by this time, and thus we will remain stranded in Istanbul. We have been in contact with an attorney from the Iranian American Bar Association (IABA) who is helping us to try and find an earlier flight.

7. The EO has caused great turmoil and distress for me and my family. My family members and I have been waiting years to be approved to enter the United States. We were distraught and very upset to learn that our travel had been canceled as a result of the EO. It shattered our hopes for starting our new life in the United States.

8. My family and I have limited economic means and were counting on the ability to soon be able to support ourselves by working in the United States. After we were unable to travel on January 30th, we were forced to stay with an acquaintance located about 6 hours outside of Istanbul and 3 hours outside of Ankara, and slept all four adults together in one room together. The IABA made arrangements for my family and I travel to Istanbul and stay in a hotel while we await safe passage to the United States.

9. I fear that the U.S. government will take retaliatory action against my family and I for being a party to this action and that our involvement will negatively impact our status in the Refugee Admissions Program. I also fear that the Iranian government will learn about my involvement in this legal action and retaliate against my father who is still in Iran.

I, Jane Doe #7, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Istanbul, Turkey.

/s/ Jane Doe #7
Jane Doe #7

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JOHN DOE #1 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #1, hereby declare and state as follows:

1. I am over the age of eighteen years. I have personal knowledge of the facts set forth herein and am competent to testify thereto.
- I. Background:**
2. I am an Iranian citizen. I first arrived in the United States on an F-1 student visa in 2015. My wife accompanied me on an F-2 visa for spouses of students.
3. I do not have any family in the United States. My entire family, as well as my wife's family, lives in Iran.
4. In September 2015, I started a PhD program in Finance and Economics at Columbia University in New York, NY. While the program is formally five years long, most candidates typically take six years to complete their PhDs. I am currently in the second year of my PhD program.

5. My wife has a PhD in electrical engineering from the University of British Columbia in Vancouver, Canada. She has completed research on the newest generation of wireless communication systems and on energy harvesting and working toward more sustainable energy systems. She is a published author in the journal of the Institute of Electrical and Electronics Engineers (IEEE), the most prominent journal in the field of electrical engineering.
6. When we moved, my wife was planning to apply for a green card so that she could secure employment in her field in the United States. We paid \$2,000.00 to retain an immigration attorney for the first phase of her green card application.

II. Harm Caused by the January 27, 2017 Executive Order:

7. On or about December 24, 2016, my wife and I flew to Iran to visit our families.
8. On or about January 22, 2017, I flew back to the United States. My wife was planning to join me later that week and had purchased a ticket for a January 28, 2017 Turkish Airlines flight from Esfahan, Iran to New York, NY.
9. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.
10. My wife attempted to board her flight on January 28, but was prevented from boarding by Turkish Airlines, citing the EO.
11. On or about January 30, 2017, my wife attempted to board a flight from Tehran, Iran to the United States, but was again turned away by the airline and not permitted to board.
12. In my opinion, it is very unlikely that the ban on entry will be lifted pursuant to its own terms as to individuals from Iran. The EO requires the Secretary of Homeland Security to produce a list of countries that “do not provide adequate information” to adjudicate visas

and other admissions. It is likely that Iran will be on that list, and very unlikely that Iran will comply with United States demands to provide more information.

13. As a direct consequence of the EO, I have been separated from my wife since January 22, 2017, and will continue to be separated for an indefinite period of time. I am faced with an inevitable decision of being separated from my wife, or withdrawing from my PhD program and flying back to Iran to be reunited with her.
14. If the EO continues to be enforced and my wife is prohibited from entering the country, I am planning to withdraw from my PhD program and fly back to Iran to be reunited with my wife in Iran.
15. Even if my wife were permitted to enter the United States on her F-2 visa, the EO makes it incredibly difficult, if not impossible, for her to secure a Green Card to work in the United States. My wife would, therefore, be relegated to staying at home rather than continuing her work and research.
16. I have not received any guidance, clarification, update, instruction, or information pertaining to the EO from the various airlines I have contacted, the United States government, or other authorities.
17. If I am forced to return to Iran I will likely be unable to complete my PhD studies and it will be very difficult for me to find employment. I protested against the Iranian government during the Green Movement after the 2009 Iranian presidential election. I was detained for four days while I was an undergraduate student. As a result of my political activity, I was permanently enjoined from studying in Iran by the Iranian government.

18. I have suffered great mental anguish and emotional distress as a result of my separation from my wife and the strong likelihood that I will have to abandon my studies.

19. I am joining this lawsuit as an anonymous plaintiff because various government agencies are named as Defendants, and I am scared of retaliation and consequences against me and my wife if I reveal my identity.

I, John Doe #1, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3 day of February, 2017, in New York, NY.

/s/ John Doe #1

John Doe #1

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

Civil Action No. _____

**DECLARATION OF JOHN DOE #2 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #2, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am a dual citizen of Iran and the United States.

3. I work as a radiology technologist at Inova urgent care in northern Virginia. I also reside in northern Virginia.

4. My parents live in Iran. My father is a dual citizen of Iran and the United States and my mother is a Green Card holder. My father is in very poor health. He is not able to travel due to his poor health.

5. One of my sisters lives in Tehran, Iran. She applied for a green card over eleven years ago and is waiting for it to be approved.

6. My mother in law and father in law, who are Iranian citizens, completed an immigrant visa interview in Ankara, Turkey and subsequently received immigrant visas to come to the United States in December 2016.

7. They were planning to move to the United States in March 2017. They are fifty-nine and sixty-nine years old, respectively.

II. Harm Suffered Post January 27, 2017 Executive Order:

8. I learned that on January 27, 2017 President Trump had signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

9. I immediately called my mother and father in law and advised them to purchase tickets for and board a flight to the United States.

10. On January 28, 2017, my father and mother in law boarded a flight from Tehran to the United States, with a layover in Amsterdam, the Netherlands.

11. Upon arrival in Amsterdam, my father and mother in law were prevented from boarding their connecting flight to the United States by KLM Airlines staff.

12. My mother and father in law attempted to and were prohibited from boarding subsequent flights to the United States. They slept in the airport in Amsterdam for four nights.

13. At the Amsterdam airport, my mother in law and father in law were put into contact with the staff of the Iranian American Bar Association (IABA). The staff, as well as

other individuals my parents met at the airport, helped them in multiple ways — for example, by calling a Senator in Maryland and a Senator in Virginia on their behalf.

14. After four days, my parents were able to board a flight to the United States. They landed in Dulles on February 2, 2017.

15. Because they are visa holders, my parents will not be able to travel back to Iran if the EO continues to be enforced. They will not be able to tend to business matters that they left unfinished when they were forced to drop everything and fly to the United States.

16. In addition, due to the EO, my sister's Green Card application is likely on hold indefinitely or has already been denied and she will be unable to move to the United States.

17. If my mother becomes a widow in the future, I was hoping she could move to the United States to live with me. I am concerned that my mother will not be able to move to the United States due to the EO.

I, John Doe #2, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 6 day of February, 2017, in Sterling, VA.

/s/ John Doe #2
John Doe #2

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JOHN DOE #3 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #3, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. My immediate family lives in Iran.
3. My wife is an Iranian citizen.
4. We currently live in Tehran, Iran.
5. My wife and I are practicing Muslims.

6. I hold a PhD in Pharmacology as well as a Doctorate of Pharmacy from a leading university in Iran. I graduated at the top of my class in each program.

7. I am currently a resident of Pharmacology at a university in Tehran, Iran.

8. I have published extensively in the field of pharmacology. Since 2007, I have been lead author or coauthor on over 40 articles in leading scientific journals.

9. This past year, I was awarded a fellowship by my university to study at a top-ranked hospital in Boston, Massachusetts. The fellowship has a term of three years. The fellowship had a start date of December 1, 2016.

10. The fellowship allows me to conduct research on diabetes effects on the heart in the lab of a professor of medicine and biochemistry at an ivy league medical school and a senior physician in cardiovascular medicine at the hospital.

11. In connection with my fellowship, I petitioned for a J-1 visa. I petitioned for a J-2 visa for my wife at the same time.

12. My wife and I had a visa interview on October 12, 2016 in the U.S. Consulate in Dubai.

13. Subsequent to the interview, I received an email instructing me to bring my passport to the U.S. Consulate in Dubai in order for my J-1 visa to be issued.

14. At that time, my wife's email was still under administrative processing. As a result, I successfully petitioned to have the start date of my fellowship changed to February 2017.

II. Harm Suffered Post January 27, 2017 Executive Order:

15. I learned from news reports that on January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

16. I travelled to the U.S. Consulate in Dubai on February 1, 2017, in order to get the J-1 visa placed into my passport.

17. When I arrived at the Consulate in Dubai, the Consulate officials told me that they were prohibited from issuing my visa due to the EO. They instructed me that I had to go back to Tehran.

18. I travelled back to Tehran from Dubai. My wife and I are still in Tehran.

19. At present, the EO makes it impossible for me to travel to the United States. If I am unable to travel to the United States, I will be unable to participate in my fellowship at the hospital.

20. The EO has completely upended my career plans, as well as my family's plans to move to the United States.

21. I am in close contact with the physician who runs the lab in which I was planning to work. We exchange emails on a daily basis with updates on my situation and the EO.

22. I have learned from the physician that they would have great difficulty finding a suitable replacement on short notice. In fact, he told me that he is very eager for me to join them and will consider it a great loss to his lab if I am not able to do so.

23. I am choosing to participate in this action anonymously because I am afraid of what the U.S. government may do if I join this lawsuit as a named plaintiff, especially if this lawsuit is not successful in overturning the EO. I fear that the U.S. government may retaliate

against me by continuing to deny issuance of my visa, and/or failing to grant future visas for me and my wife if they find out that I have publicly opposed the EO.

I, John Doe #3, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Tehran, Iran.

/s/ John Doe #3

John Doe #3

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JOHN DOE #4 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #4, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. My family and I are currently located in Turkey while we await safe passage to the United States as refugees who have been accepted to the US Government's Refugee Admissions Program. We cannot return to Iran. Approximately three years ago my two sisters, mother, and I fled Iran due to fears of political persecution. We applied

to be admitted to the United States as refugees and were approved by the U.S. Government to enter the United States under the admissions program.

3. The Jewish Family Services organization, an affiliate of HIAS, has made arrangements to assist my family and I upon our arrival in the United States and is helping us find a place to live in Seattle, Washington.

4. The International Organization for Migration (IOM), which works with the U.S. Government to transport approved refugees to the United States, had provided me and my family members valid visas to enable us to travel to the United States. We were scheduled to fly from Turkey to Seattle, Washington on January 30, 2017. Our travel was not possible because of President Trump's January 27, 2017 Executive Order.

II. Harm Suffered Post January 27, 2017 Executive Order:

5. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

6. As a result of the EO, my family and I were not allowed to fly to the United States on January 30, 2017. We are currently still stranded in Turkey. The IOM has booked a new flight for us to travel to the United States on Wednesday, February 8, 2017. I am hoping we can go. However, due to the uncertainty surrounding the status of the EO and its enforcement, my family and I fear that we will not be allowed to travel to the United States on February 8. We are greatly concerned that the travel ban for Iranian visa holders such as ourselves will be reinstated by this time, and thus we will remain stranded in Istanbul. We have been in contact with an attorney from the Iranian American Bar Association who is helping us to try and find an earlier flight.

7. The EO has caused great turmoil and distress for me and my family. My family members and I have been waiting years to be approved to enter the United States. We were distraught and very upset to learn that our travel had been canceled as a result of the EO. It shattered our hopes for starting our new life in the United States.

8. My family and I have limited economic means and were counting on the ability to soon be able to support ourselves by working in the United States. After we were unable to travel on January 30th, we were forced to stay with an acquaintance located about 6 hours outside of Istanbul and 3 hours outside of Ankara, and slept all four adults together in one room together. The IABA made arrangements for my family and I travel to Istanbul and stay in a hotel while we await safe passage to the United States.

9. I fear that the U.S. government will take retaliatory action against my family and I for being a party to this action and that our involvement will negatively impact our status in the Refugee Admissions Program. I also fear that the Iranian government will learn about my involvement in this legal action and retaliate against my father who is still in Iran.

I, John Doe #4, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Istanbul, Turkey.

/s/ John Doe #4

John Doe #4

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JOHN DOE #5,
ON BEHALF OF HIMSELF AND HIS MINOR CHILD BABY DOE #1,
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #5, on behalf of himself and his minor child Baby Doe #1, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

2. My son is Baby Doe #1. He is a minor approximately 6 months old.

I. Background:

3. I am an Iranian citizen. I entered to United States in September 2009 on an F-1 student visa. I have been studying and working in the United States since then. I received a Masters Degree in mechanical engineering in 2012 from the University of Buffalo in New York, and in 2015 I received my PhD in mechanical engineering from the University of Buffalo. I am

currently working as a post-doctoral fellow with the SUNY Research Foundation. After entering the United States on an F-1 visa in 2009, I returned to Iran two times. Once in 2012 because I had a family emergency, and again in 2013 to be married to my wife. Both times I applied for and received a valid F-1 visa to return to the United States. I was interviewed and had to pass a lengthy security clearance all three times I applied for an F-1 student visa.

4. I live with my wife and our infant son, Baby Doe #1, in New York. After we were married in 2013, my wife traveled with me to the U.S. with a valid F-2 visa, which is available for dependents of F-1 visas.

5. My son was born in the United States in August 2016. He has both a United States and Iranian passport.

6. On January 4, 2017, my wife and son traveled to Iran to introduce my son to our family in Iran. Most of my family is in Iran and my parents and in-laws in particular were very excited to meet my son, as he is currently their only grandchild. My wife and son were planning to stay in Iran for several months so that everyone in our families could meet my son. I purchased a plane ticket for my wife and son to fly back to the United States on or about April 4, 2017.

7. Before my wife left for Iran, we scheduled an appointment at the U.S. consulate in Dubai on January 17, 2017 for my wife to apply for a new F-2 visa. My wife had to travel from Tehran to Dubai for the interview and was unable to take our son on her journey to Dubai. My wife was interviewed at the U.S. consulate and provided all the necessary documentation. The U.S. consulate approved her F-2 visa request that same day, January 17, 2017. My wife left Dubai immediately after her interview because she needed to return to our son in Iran.

II. Harm Suffered Post January 27, 2017 Executive Order:

8. After an F-2 visa is approved by the U.S. consulate, it takes several days to process the paperwork and issue the F-2 visa. On January 26, 2017, at approximately 2:00 a.m., I received an email from the U.S. consulate stating that my wife's F-2 visa was ready to be issued and asking my wife to bring her passport to the U.S. consulate. Shortly afterwards, my wife made arrangements for an agency in Iran to take her passport to the U.S. consulate and issue her F-2 visa. Agencies like this are very common in Iran and are often used by individuals like my wife, who are unable to stay in Dubai while consulate takes several days to issue the visa after it is approved. These agencies typically take about 4 to 5 days to travel to Dubai, receive the visa, and return the passport.

9. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders and others into the United States.

10. Because of the EO, the U.S. consulate refused to issue the F-2 visa to my wife, even though the visa had already been approved. The agency that my wife hired to take her passport to Dubai returned her passport without the visa.

11. My wife and I continued to try and contact the U.S. consulate to find out how it refused to issue her visa and how my wife could obtain her visa. After a federal district judge in Washington temporarily restrained enforcement of the EO, my wife contacted the U.S. consulate on February 4, 2017, seeking clarification about the status of her F-2 visa. My wife explained that her F-2 visa was approved but has not yet been issued. The U.S. consulate informed by wife that she may send her passport again and that the U.S. consulate will issue it this time. My wife and I are very concerned that the situation will change by the time her passport reaches the U.S.

consulate in Dubai. We fear that the EO will be reinstated and that the U.S. consulate will once again refuse to issue my wife's F-2 visa.

12. More importantly, as a result of the EO, my wife and infant son may no longer be allowed to return to the United States on April 4, 2017. My son is too young to travel on his own and my wife may not be able to enter the United States even if she obtains the F-2 visa from the consulate. We are very concerned about my son's health. Because he is so young, he is still completing his vaccinations. He is currently scheduled to receive his third round of vaccines in the beginning of April. It is not possible for him to receive the vaccines—he must return to the United States to do so.

13. Moreover, the EO prevents me, an Iranian citizen with legal status to live and work in the United States, from going to Iran to collect my son and bring him home. Under the terms of the EO, if I leave Iran now, I run a substantial risk of not being allowed to return to the United States either because I would be unable to obtain another F-1 visa or because I would be unable to board a flight even if I had a valid F-1 visa. I also risk losing my job in the United States if I travel to Iran now to be with my wife and son.

14. I fear that U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned about retaliation against my wife, who is in a very precarious situation because her visa has been approved but not yet issued by the U.S. consulate.

I, John Doe #5, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Amherst, NY.

/s/ John Doe #5
John Doe #5, on behalf of himself
and his minor child, Baby Doe # 1

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance of Iranian Americans,)
Inc. *et al*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JOHN DOE #6 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #6, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen. I live in Malaysia with my wife, four-year-old son, and eight-year-old son. I work in the oil and gas industry as a directional driller. For many years I worked for one of the largest American oil and gas drilling companies. Before I was hired I had to complete an extensive background check. I have to travel a lot for work. I am currently located on an off-shore oil rig approximately 6 hours from the Southern coast of Iran.

3. My family and I won the Green Card lottery. We were so excited to finally be able to move to the United States and we made arrangements to settle down in Tampa Bay, Florida, where we have close friends who are like family.

4. On or about January 26, 2017, my family received our visas to travel to the United States. We booked flights to the United States for January 29, 2017, the earliest flight we were able to get. Our visas are set to expire in July 2017.

II. Harm Suffered Post January 27, 2017 Executive Order:

5. On January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders and others into the United States.

6. As a result of the EO, my family and I cancelled our January 29, 2017 flight to the United States. We learned that because of the EO Iranian citizens were not being allowed to board planes, even if they had a valid visa. My wife and I were also concerned that we would be stranded with our two young children or detained in an airport.

7. I emailed the U.S. embassy in Malaysia after the EO was signed and the embassy replied that my family and I could not travel to the United States. It is our understanding that so long as the EO remains in effect we will be unable to enter the United States.

8. I work in the oil and gas industry and was laid off in 2015 after the price of oil decreased dramatically. While I was able to find a new job, the oil industry is still a bit unstable and I remain concerned about being able to provide for my family. I decided that it would be best for me to continue working after the EO prevented my family and I from flying to the United States on January 29, 2017. I work on offshore oil rigs and I was sent to a rig about 6 hours off the coast of Southern Iran. A few days later, I learned that the travel ban in the EO had been temporarily stayed due to the emergency ruling of a federal court in the United States, and thus

Iranian citizens with valid visas were being allowed to enter the United States. I quit my job as soon as I found out but because of the nature of my work I am not able to immediately leave the oil rig. I have to wait for a replacement, which takes time since we are located so far offshore and usually work in approximately four-week rotations.

9. My family is waiting for me to travel to the United States. When my wife was studying in Canada, my son and I were unable to join her and the separation was very difficult. We are very afraid that if my wife and sons travel to the United States without me that we will be separated again. My wife and sons will fly from Malaysia to Iran once I am able to leave the oil rig. As soon as my replacement arrives, I intend to travel to Iran to meet my wife and sons and if possible we will all board the next available flight to the United States.

10. My family and I are very concerned that the EO will go back into enforcement and will once again prevent us from traveling to the United States. I have been unable to sleep or eat because I am so anxious and worried. My family and I felt so lucky to win the Green Card lottery and were looking forward to settling down in Florida. We have already packed everything and sold most of our possessions in Malaysia in preparation to move the United States. We will be devastated if we miss our opportunity to go the United States and instead will have to stay in Malaysia or I will have to find another job elsewhere. There are more opportunities in the United States for my line of work and I would like to be able to work closer to where my family lives.

11. I fear that the U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned that the U.S. government will revoke our visas and not allow us to obtain our Green Cards because of my involvement.

I, John Doe #6, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Tehran, Iran.

/s/ John Doe #6
John Doe #6

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance Of Iranian Americans,)
Inc. *et al.*,)
)
Plaintiffs,)
)
v.)
)
Donald J. Trump, President of the United States,)
et al.)
)
)
Defendants.)

Civil Action No. _____

**DECLARATION OF JOHN DOE #7 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #7, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen currently living in Turkey and seeking to be admitted to the United States as a refugee.

3. I have been in a loving committed relationship with my partner, John Doe # 8, for many years. My partner and I were both born and raised in Iran. Both of us also grew up in

Muslim households. The Muslim community in Iran has not been accepting of our sexual orientation.

4. My partner and I lived together in Iran for eight years. Because of this, we experienced harassment from the Iranian people. Most or all of this harassment stemmed from religious intolerance for same-sex couples in Iran. Our neighbors were suspicious of us because we were two men living together. On several occasions our neighbors reported us to the Iranian police. We lived in constant fear that we would be taken by government officials, who tolerate and even encourage violence against same-sex couples in Iran. I have heard of homosexual men being arrested and beaten in Iranian prisons. We stopped answering the door because we were very afraid of the police coming to arrest us. The harassment also made us feel unwanted in Iran. We were forced to move at least three different times because either landlord or the neighbors complained. The harassment was so strong that we constantly feared for our safety and were forced to flee Iran.

5. My partner and I have been living in exile in Turkey for approximately 27 months. Our life in Turkey has been very difficult. We live in a small town where many people do not accept our relationship and we live in fear of violence against us. In this atmosphere, we are constantly afraid for our safety. Both my partner and I worked full time when we lived in Iran. We are not allowed to work in Turkey.

6. My partner is very ill. He was diagnosed with colitis and he experiences a lot of physical pain. Our sub-standard living conditions worsen his health conditions. We need to go to a country where he can recover and we can get adequate medical care.

7. My partner and I are in a terrible situation. Because of our sexual orientation, we were unsafe in Iran and are unsafe in Turkey. We have applied for refugee status and would like

to be resettled to the United States where we will be safe from persecution and where my partner can receive treatment for his medical condition. We reached out to the Office of the UN High Commissioner for Refugees (UNHCR) after we arrived in Turkey and told them we wished to be referred to the U.S. Refugee Admissions Program. After a lengthy interview and vetting process, UNHCR agreed to our application for refugee status, gave us documentation of that approval, and referred us to the U.S. Refugee Admissions Program. We are now waiting for the decision of the United States on acceptance to the program. We know that the United States Refugee Admissions Program has admitted to the program many same-sex applicants and are waiting to be processed. It has been approximately 120 days since we received the certificates from the UN and referral to the US admissions program.

II. Harm Suffered Post January 27, 2017 Executive Order:

8. I am aware that, on January 27, 2017, President Trump signed an Executive Order (EO) that impacts the refugee admissions process for citizens from certain countries, including Iran.

9. My partner and I check the website icmc.net, a website referred to us by the United Nations, nearly every day to keep track of our status in the U.S. refugee admissions process. After the EO was signed, the website posted a notice informing us that refugees and refugee applicants from Iran pending admission to the U.S. program could not travel to the United States due to the EO.

10. The EO has caused us great distress. My partner and I are very concerned about whether we will ever be approved by the United States to participate in the Refugee Admissions Program.

11. Since the EO was issued my partner's health has severely worsened. He is not able to obtain the medical care needed where we live now. I also fear that his health will continue to decline because we are experiencing so much anxiety and uncertainty surrounding the EO and its impact on our refugee applications.

12. My partner and I fear that U.S. government will retaliate against us because of our involvement in this lawsuit. We are concerned that our involvement will impact our acceptance in the Refugee Admission Program and harm our chances to be approved by the United States. We also fear persecution from the Iranian government if it were to become aware of our application for refugee status in the United States, or our involvement in this lawsuit.

I, John Doe #7, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of February, 2017, in Denizli, Turkey.

/s/ John Doe #7
John Doe #7

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)
Iranian American Bar Association,)
National Iranian American Council,)
Public Affairs Alliance Of Iranian Americans,)
Inc. *et al.*,)

Plaintiffs,)

v.)

Civil Action No. _____

Donald J. Trump, President of the United States,)
et al.)

Defendants.)

**DECLARATION OF JOHN DOE #8 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #8, hereby declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained herein.

I. Background:

2. I am an Iranian citizen currently living in Turkey and seeking to be admitted to the United States as a refugee.

3. I have been in a loving committed relationship with my partner, John Doe # 7, for many years. My partner and I were both born and raised in Iran. Both of us also grew up in

Muslim households. The Muslim community in Iran has not been accepting of our sexual orientation.

4. My partner and I lived together in Iran for eight years. Because of this, we experienced harassment from the Iranian people. Most or all of this harassment stemmed from religious intolerance for same-sex couples in Iran. Our neighbors were suspicious of us because we were two men living together. On several occasions our neighbors reported us to the Iranian police. We lived in constant fear that we would be taken by government officials, who tolerate and even encourage violence against same-sex couples in Iran. I have heard of homosexual men being arrested and beaten in Iranian prisons. We stopped answering the door because we were very afraid of the police coming to arrest us. The harassment also made us feel unwanted in Iran. We were forced to move at least three different times because either landlord or the neighbors complained. The harassment was so strong that we constantly feared for our safety and were forced to flee Iran.

5. My partner and I have been living in exile in Turkey for approximately 27 months. Our life in Turkey has been very difficult. We live in a small town where many people do not accept our relationship and we live in fear of violence against us. In this atmosphere, we are constantly afraid for our safety. It has been very difficult for us to find employment.

6. I am very ill. I was diagnosed with colitis and experience a lot of physical pain. Our sub-standard living conditions worsen my health conditions. We need to go to a country where I can recover and get adequate medical care.

7. My partner and I are in a terrible situation. Because of our sexual orientation, we were unsafe in Iran and are unsafe in Turkey. We have applied for refugee status and would like to be resettled to the United States where we will be safe from persecution and where I can

receive treatment for my medical condition. We reached out to the Office of the UN High Commissioner for Refugees (UNHCR) after we arrived in Turkey and told them we wished to be referred to the U.S. Refugee Admissions Program. After a lengthy interview and vetting process, UNHCR agreed to our application for refugee status, gave us documentation of that approval, and referred us to the U.S. Refugee Admissions Program. We are now waiting for the decision of the United States on acceptance to the program. We know that the United States Refugee Admissions Program has admitted to the program many same-sex applicants and are waiting to be processed. It has been approximately 120 days since we received the certificates from the UN and referral to the US admissions program.

II. Harm Suffered Post January 27, 2017 Executive Order:

8. I am aware that, on January 27, 2017, President Trump signed an Executive Order (EO) that impacts the refugee admissions process for citizens from certain countries, including Iran.

9. My partner and I check the website icmc.net nearly every day to keep track of our status in the U.S. refugee admissions process. After the EO was signed, the website posted a notice informing us that refugees and refugee applicants from Iran pending admission to the U.S. program could not travel to the United States due to the EO.

10. The EO has caused us great distress. My partner and I are very concerned about whether we will ever be approved by the United States to participate in the Refugee Admissions Program.

11. Since the EO was issued my health has severely worsened. I am unable to obtain the medical care needed where we live now. The anxiety and uncertainty surrounding the EO

and its impact on our refugee applications has also caused my health to worsen because of the additional stress.

12. My partner and I fear that U.S. government will retaliate against us because of our involvement in this lawsuit. We are concerned that our involvement will impact our acceptance in the Refugee Admission Program and harm our chances to be approved by the United States. We also fear persecution from the Iranian government if it were to become aware of our application for refugee status in the United States, or our involvement in this lawsuit.

I, John Doe #8, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of February, 2017, in Denizli, Turkey.

/s/ John Doe #8
John Doe #8

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PARS EQUALITY CENTER et al.,

Plaintiffs,

v.

DONALD J. TRUMP et al.,

Defendants.

Civil Action No. 17-cv-255

**PROPOSED ORDER GRANTING PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

The Court, having considered Plaintiffs' Motion for Preliminary Injunction ("Motion") and any opposition thereto, and finding that good cause appears, orders as follows:

The Motion is hereby GRANTED. Defendants are hereby preliminarily restrained and enjoined from:

(a) enforcing §§ 3(c), 5(a), 5(b), 5(c), and 5(e) of Executive Order No. 13,769, "Protecting the Nation from Foreign Terrorist Entry into the United States," including at any United States border or point of entry;

(b) applying §§ 3(c), 5(a), 5(b), 5(c), or 5(e) of the Executive Order to deny, revoke, restrict or cancel any immigrant or nonimmigrant visa;

(c) applying §§ 3(c), 5(a), 5(b), 5(c), or 5(e) of the Executive Order to deny or suspend entry or admission to any person;

(d) applying §§ 3(c), 5(a), 5(b), 5(c), or 5(e) of the Executive Order to prohibit any person from applying for any benefit under the Immigration and Nationality Act of 1965;

(e) denying any person subject to the Executive Order access to legal counsel of his or her choice;

(f) applying Sections §§ 3(c), 5(a), 5(b), 5(c), or 5(e) of the Executive Order to instruct any airline or other common carrier to deny passage to any person;

(g) imposing or threatening to impose any financial penalty on any airline or other common carrier for allowing passage to any person covered by §§ 3(c), 5(a), 5(b), 5(c), or 5(e) of the Executive Order.

IT IS SO ORDERED.

Dated: February __, 2017

U.S. DISTRICT JUDGE