

EXHIBIT 4

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

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

Plaintiffs,)

v.)

Civil Action No. 17-255

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. My parents applied for a tourist visa to come visit me and, in October 2016, had an interview at the United States Embassy in Yerevan, Armenia. At the conclusion of the interview the consular official informed my parents that their applications were being referred for administrative processing. He explained that administrative processing was akin to a security or background check.

13. The consular official never told my parents, either during or after their interview, that their visa was either approved or refused. To date, neither they nor I have received any correspondence indicating that their visa has been either refused or approved.

14. I very frequently check the website of the U.S. Embassy in Armenia for any updates on my parents' visa applications.

15. My son was born on November 28, 2016. My parents were not present for his birth pending their visa applications and administrative process.

16. 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 From January 27, 2017 Executive Order:

17. I understand that President Donald Trump signed an Executive Order on January 27, 2017 (January 27 Executive Order) immediately prohibiting the issuance of visas to Iranian citizens, and preventing the entry of Iranian citizens into the United States.

18. The morning after the January 27 Executive Order was signed, the immigration attorney that I had retained advised me that I should not leave the United States due to the January 27 Executive Order.

19. As a result of the January 27 Executive Order, 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 were not able to meet their grandson as originally planned.

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

Executive Order, I became concerned about my ability to exit and reenter the United States and subsequently decided not to visit the Netherlands as originally planned.

III. Harm From March 6, 2017 Executive Order

21. I understand that President Trump issued an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

22. On March 29, 2017, I checked the website for updates about my parents' visa. The website indicated that my parents' case had been created on October 12, 2016. The website also displayed the following message: "Your visa case is currently undergoing necessary administrative processing. This processing can take several weeks. Please follow any instructions provided by the Consular Officer at the time of your interview. If further information is needed, you will be contacted. If your visa application is approved, it will be processed and mailed/available within two business days. For more information, please visit U.S. Embassy Yerevan."

23. On May 21st, we travelled to Bodrum, Turkey so that my parents could finally meet their grandson. When we were boarding the leg of our return flight from Paris, France to the United States on July 2, we were pulled out of the boarding line at the departure gate by security. Security searched all of my hand luggage, including our baby's diaper bag. We were told it was a "random" search, but I knew it was not random because I clearly saw my name on a list held by security.

IV. Harm From September 24, 2017 Executive Order

24. I understand that President Trump issued an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

25. I understand that the September 24 Executive Order will block the issuance of my parents' tourist visas.

26. I have checked the online status of my parents' tourist visas. As of the date of this declaration, my parents' visa application remains in "administrative processing."

27. I have received no guidance, information, clarity, instruction, or correspondence from the United States government 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 September 24 Executive Order.

28. As a result of the confusion and uncertainty surrounding my parents' visa applications under the terms of the Executive Order, my family and I have been greatly emotionally distressed about whether my family and I will be able to host my parents in our home here in the United States.

29. Given my father's illness, I am concerned about whether he and my mother will continue to be able to meet us in third countries to see one another in the future. Doing so will likely become more difficult for them in the future, and doing so puts a strain on all of us.

30. The three Executive Orders — including the September 24 Executive Order — have made me feel as though I can never be "at home" here in the United States. I have a family here, I have worked here, and my baby was born here, but I feel like I am just waiting for the other shoe to drop. Sometimes I even worry that I might get deported even though I am a lawful permanent resident. The Executive Orders have caused me to feel that, no matter what my visa status is, I will always be a foreigner or stranger in this country.

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

Executed this 2 day of October, 2017, in Spokane, Washington.

/s/ Shiva Hissong
Shiva Hissong

Exhibit to Declaration of Shiva Hissong

Chrome File Edit View History Bookmarks People Window Help

Nonimmigrant Visas | U.S. Em x https://als.usvisa-info.com/en x CEAC x

Secure | https://ceac.state.gov/CEACStatTracker/Status.aspx?eQs=WwjQOlbeFYzCYubaSQI+RA==

Thursday, September 28, 2016 9:08 AM

View as Analog
✓ View as Digital
Open Date & Time Preferences...

U.S. Department of State NONIMMIGRANT VISA APPLICATION

Administrative Processing

Application ID or Case Number: [REDACTED]
Case Created: 12-Oct-2016
Case Last Updated: 12-Oct-2016

Your visa case is currently undergoing necessary administrative processing. This processing can take several weeks. Please follow any instructions provided by the Consular Officer at the time of your interview. If further information is needed, you will be contacted. If your visa application is approved, it will be processed and mailed/available within two business days.
For more information, please visit [U.S. Embassy Yerevan](#).

Visa Status Check

Welcome! On this website, you can check your U.S. visa application.

Visa Application Type
NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location
ARMENIA, YEREVAN

Application ID or Case Number
[REDACTED]
(e.g., ARMBQAAA 2017 1234567)

Enter the code as shown
US985

Submit

This site is managed by the Bureau of Consular Affairs, U.S. Department of State. External links to other Internet sites should not be construed as an endorsement of the views contained therein.

Chrome File Edit View History Bookmarks People Window Help

Nonimmigrant Visa [U.S. En. x] https://ale.usvisa-info.com/en x CEAC
 Secure https://ceac.state.gov/CEACStatTracker/Status.aspx?eQs=WwjQOIbaRYzCYubaSQL+RA==

Thursday, September 28, 2017
 View as Analog
 ✓ View as Digital
 Open Date & Time Preferences...



Visa Status Check

Welcome! On this website, you can check your U.S. visa application

Visa Application Type

NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location

ARMENIA, YEREVAN

Application ID or Case Number

[Redacted]

12-10-2016 12:00:00

Enter the code as shown

DSH00K

Submit

U.S. Department of State NONIMMIGRANT VISA APPLICATION

Administrative Processing

Application ID or Case Number: [Redacted]

Case Created: 12-Oct-2016

Case Last Updated: 12-Oct-2016

Your visa case is currently undergoing necessary administrative processing. This processing can take several weeks. Please follow any instructions provided by the Consular Officer at the time of your interview. If further information is needed, you will be contacted. If your visa application is approved, it will be processed and mailed/available within two business days. For more information, please visit [U.S. Embassy Yerevan](#).

Close

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EXHIBIT 5

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

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

Plaintiffs,

v.

Civil Action No. 17-255

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

Defendants.

**DECLARATION OF MONTRA YAZDANI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

1. My name is Montra Yazdani. 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 Washington, DC. I was born in Iran.

3. I first came to the United States with my parents and brother in October 2001 because my father was invited to pursue research at the Cleveland Clinic. My father is an ophthalmologist in Iran. He was invited by the director of the Center for Genetic Eye Diseases at

the Cleveland Clinic's Cole Eye Institute to collaborate on an ongoing research relating to a genetic mutation causing congenital fibrosis of extraocular muscles of the eye, which is a type of disease.

4. The Cleveland Clinic arranged and helped us apply for J visas. My family and I entered the United States on J1 and J2 visas.

5. My father's research was completed in 2002. It was a great success as they were able to discover the specific gene mutation which caused the eye disease at issue. The findings of the research, authored by my father, were published in the American Journal of Ophthalmology.

6. My parents returned to Iran in 2002. At that time, my brother had already begun school at Cleveland State University. He applied for and received an F1 visa. I had also enrolled in a private high school in Cleveland and received an F1 visa. One year later, we both attended the Miami University of Ohio. My brother went on to medical school in St. Louis, Missouri while I attended law school in San Francisco. After receiving my J.D., I pursued a Master of Laws (LLM) degree in Intellectual Property (IP) law in Washington, DC.

7. For fifteen years, my brother and I never went back to Iran because our visas were single entry and would expire upon our departure from the United States

8. During this time, my parents visited us in the United States roughly every two years. They were able to apply for and receive tourist visas to visit us. Since their departure in 2002, they visited the United States on tourist visas a total of seven times.

9. I met and married my husband, who is a U.S.- born citizen, in the United States. My brother, who is now a neuro-radiologist, met and married his wife, who is a U.S.- born citizen, here. My brother and his wife have two children and live in Charleston, SC. His daughter is three years old and his son is almost one year old.

10. I am now a practicing attorney in Washington, DC. I work at a boutique intellectual property law firm practicing patent and trademark prosecution. I am a board member of the Iranian American Bar Association (IABA). I became a naturalized United States citizen on August 11, 2015.

11. My brother is a lawful permanent resident of the United States. He has applied for his citizenship.

12. Given the fact that my brother and I have settled down with our new families in the United States, and because of our increased desire to spend more time with our parents as they are aging, I petitioned for my parents to receive their green card in early 2016. Our parents have a mutually strong desire to move to the United States to spend the rest of their lives with their children and now grandchildren.

13. Once my parent's green card petition was approved, it was forwarded for consular processing in Abu Dhabi. Upon completing and submitting all the required documents, performing their fingerprinting and medical examination, my parents were scheduled for a visa interview in Abu Dhabi in July 2017. Their immigrant visas were both approved at the interview. The consular official told my mother that my mother's visa could be issued immediately, but that my father's visa had to go through additional administrative processing. My mother chose not to receive her visa at that moment and instead wanted to wait for my father's visa to be processed, so that their visas could be issued at the same time.

14. Immediately after their interview, we received a secondary 'supplemental questions for visa applicants' questionnaire for my father's application via e-mail. We submitted the responses to this extensively detailed questionnaire on August 5, 2017. We have not been able to confirm the status of my father's visa through the link provided to us in the supplemental

questionnaire email. We were nearing the end of the process and my brother and I were very excited that my parents would soon be joining us in the United States.

IV. Harm From September 24, 2017 Executive Order

15. I understand that President Trump issued an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

16. I understand that the September 24 Executive Order will block the issuance of my parents' immigrant visas; or, at minimum, it will block the issuance of my father's visa, and my mother will not immigrate to the United States without my father.

17. I have checked the online status of my parents' visas. Both my mother and father's online visa status on the U.S. Department of State's website indicates that their visa is undergoing administrative processing.

18. My father's visa status on the Abu Dhabi embassy's website says "no information has been found about the case number you entered."

19. We have been unable to find out any further information regarding the impact of the September 24 Executive Order on my parents' visas.

20. My brother and I are deeply saddened by the fact that this travel ban will prevent us from having our parents visit us at our home and spend time with them in our home country. I have now lived more than half of my adult life here in the United States and feel more American than an Iranian. As an American citizen, I have contributed greatly to U.S. society for the past sixteen years of my life and yet now I am being banned from bringing my parents here because of the country in which I was born.

21. In an ideal world, my parents would come to visit me at my house. But now, the best case scenario for us is to meet in Europe. That is also difficult for me because I have to take

time off work — ideally two weeks at a time — and then spend a lot of money to travel to Europe to see them; if my husband would like to join me to visit his in-laws, it is even more difficult for both of us to take time off work and spend even more money on flights and hotels. It is a great burden on both of us to keep traveling to see one another.

22. I am not able to go to Iran to visit my parents. I went back to Iran for the first time in 15 years in the summer of 2016. When I landed at the airport in Iran, I was taken to a special room and interrogated. The Iranian government officials asked me why I was traveling to Iran and demanded detailed information such as the addresses, phone numbers, emails, job titles, etc. of me, my husband, my brother and parents. They further interrogated me as to what type of work I do in the U.S. and why I was visiting Iran after 15 years.

23. I have recently noticed that multiple individuals who work for the national Iranian Radio and Television have viewed my LinkedIn profile.

24. As a result, I feel like the Iranian Government is researching and monitoring me. They may have started surveilling me because I am an Iranian-American attorney working in Washington, DC and have close connections and pictures linking me with many high profile individuals and organizations to which the Iranian government is opposed.

25. I would not feel safe traveling to Iran right now.

26. As a result of feeling unsafe traveling to Iran, neither me nor my parents can visit each other in our homes. The forced separation from my parents is making it more frustrating and difficult for me to live in and be a citizen of the United States and make my contribution here. I can't help but think that, if my parents weren't from one of the countries listed in the September 24 Executive Order, I would not be banned from seeing them. It's unfair.

27. My brother would like my parents to spend time with his young children and would like for his children to have the added value of growing up with grandparents. It would be tragic if my parents were not able to come here to see their grandchildren grow up.

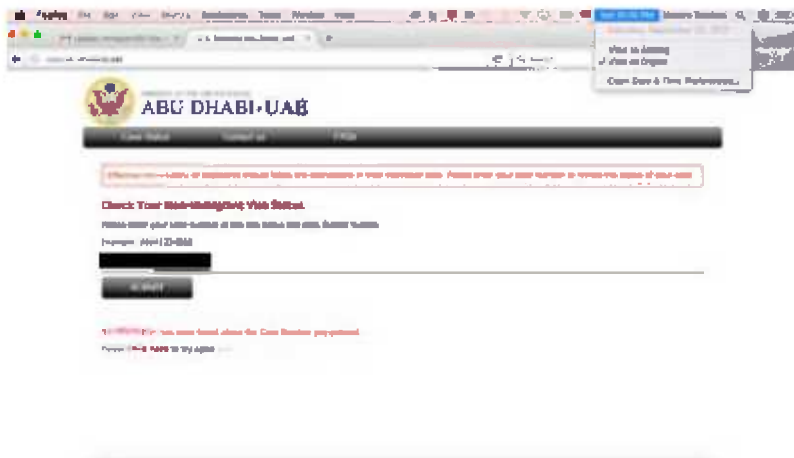
28. In thinking about having children of my own, I know that I would like to have my mother by my side to help me. I had always planned that my mother would be able to get a green card and be here by 2019, which is when my husband and I were hoping to have a baby. I cannot imagine raising a child without my mother to help me. This travel ban has made me re-consider having children until my mom is able to move and live in the United States.

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

Executed this 1 day of October, 2017, in Alexandria, Virginia.

/s/ Montra Yazdani
Montra Yazdani

Exhibit to Declaration of Montra Yazdani



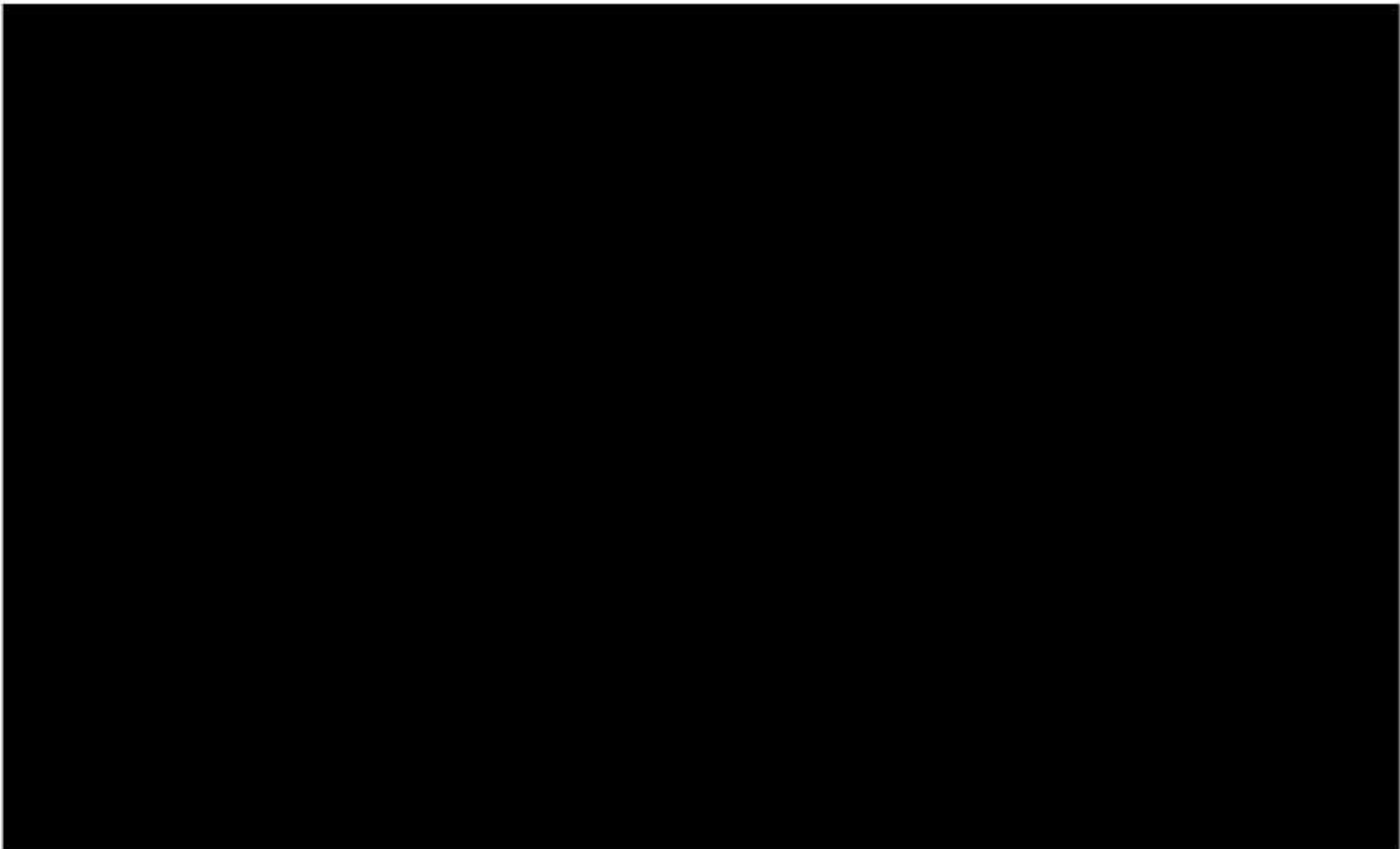
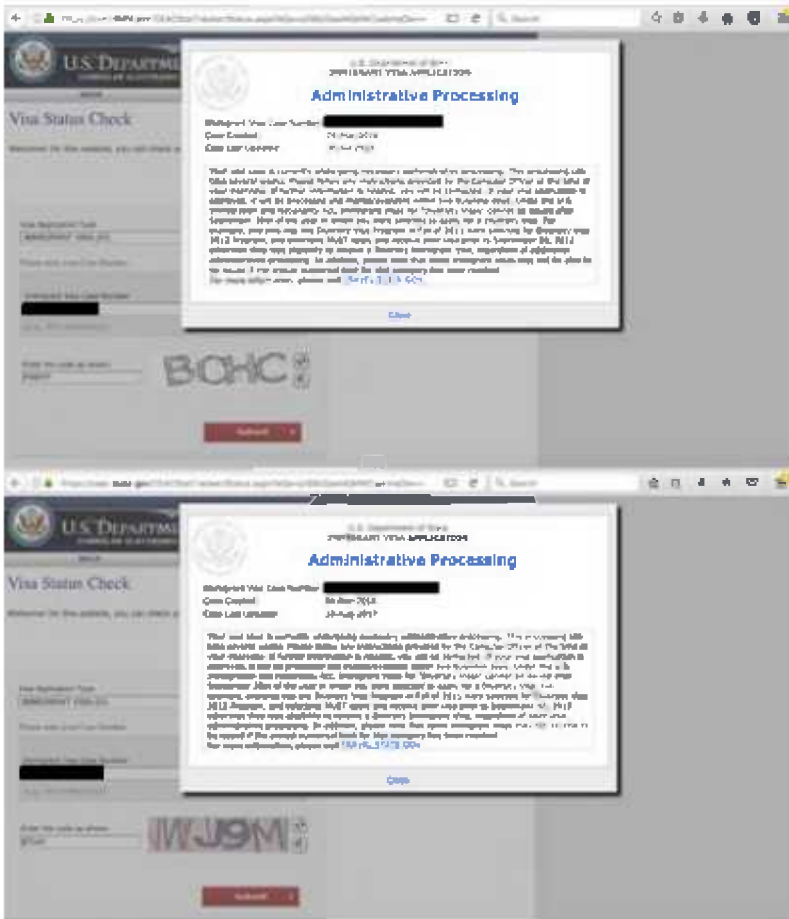


EXHIBIT 6

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**DECLARATION OF SEPIDEH GHAJAR IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Sepideh Ghajar, 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 36 years old and currently reside in Mountain View, California. I am the co-founder and chief executive officer of Taygo, located in Palo Alto and San Carlos, California. I have a bachelor's degree in software engineering from the University of Tehran.

3. I am an Australian Citizen and a U.S. Green Card holder. I was born in Iran and am also an Iranian citizen.

4. After graduating from the University of Tehran, I was selected for a highly competitive internship program at IBM. This internship soon turned into a full-time position. My experience at IBM deepened the passion I had had from a very young age for technology.

5. In 2005, at the age of 24, I moved from Iran to Australia under the skilled visa program in order to build my technical skills and ultimately pursue my dream of starting my own company. I lived in Melbourne, Australia for approximately seven years. During that time, I became an Australian citizen and worked as a software engineer, web application architect, and freelance Microsoft consultant.

6. After discussing my goals with several mentors who had started businesses in Australia, I began to realize that conditions in the United States were much more favorable for entrepreneurs.

7. In 2012, I left Australia and moved to New York City. While in New York, I co-invented a new technology platform to innovate digital workspace interaction experiences, known today as LiveTiles. LiveTiles became a success soon after it was released and turned into an acquisition before its one-year anniversary.

8. In 2015, I moved to Silicon Valley in order to finally start own venture. The company I founded, Taygo, was officially registered last year, and we have thus far hired ten people, all but one of whom are American citizens.

9. Since founding Taygo, my workload has been extremely demanding. I have been almost solely responsible for building a professional network, attracting investors, finding customers, and recruiting talent. Because I do not have a partner or any family in California, this process has been very emotionally difficult and isolating for me.

10. In order to help me get through this challenging period, I asked my mother, Masoumeh Jamei, to come stay with me. My mother is 60 years old and an Iranian citizen.

11. My mother agreed and immediately applied for a B-1/B-2 visa. She travelled to American Embassy in Dubai for her visa interview approximately one and a half years ago, and was told she would be notified once a decision was reached on her application. However, she heard nothing from the Embassy after that, despite checking multiple email accounts and the Embassy website daily.

12. To this day, when we check the website of the American Embassy in Dubai, it says the status of my mother's application is "processing."

13. My mother was told by a friend that her first visa application was likely a lost cause, and she should submit a second application. She did so, and again travelled to Dubai in June 2017. When she arrived, Embassy officials told her that her second application could not be processed because her first application had in fact been approved several months earlier. When she explained that she had not received any notification of this approval, Embassy officials told her that the status listed on the Embassy website was inaccurate and could not be relied upon. Nevertheless, because she had never shown up to retrieve the visa, her application would have to be renewed.

14. My mother was told that the renewal process should take approximately three to four weeks. However, after several months, we still have not heard anything from the Embassy.

II. Harm Caused by the September 24, 2017 Executive Order:

15. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

16. I have checked the online status of my mother's visa. As of the date that I signed this declaration, the status says, "processing."

17. To date, I have received no guidance or clarity from the Embassy or any other government entity about the impact of the September 24, 2017 Executive Order on my mother's visa application.

18. The Executive Order and related guidance have caused me and my mother great inconvenience, confusion, and pain.

19. I cannot travel to Iran to see my mother because I am nervous that I may be detained there as a result of my last name, which is associated with monarchy in Iran and has made me the subject of harassment in the past. Additionally, all my employees, investors, and customers are relying on me to make the company a success, and I cannot afford to take time off to travel internationally. In fact, I have not taken time off in the past three years.

20. I am worried that, if the ban takes effect, I may not be able to see my mother for many years. We are very close, and being separated from her for so long, especially during such a stressful time, has been extremely difficult.

21. I feel that the September 24 Executive Order is unfairly discriminating against good, hardworking people who are making important contributions to American society. It seems very unfair that, despite the fact that I have created jobs in this country, I myself have have had to suffer being separated from my family because of the Executive Order.

22. As a result of everything that has happened, I no longer feel at home in this country as I once did. I feel like my contributions are not valued, and that I am seen as a threat by the government.

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

Executed this 2 day of Oct, 2017, in San Carlos CA

A handwritten signature in black ink, appearing to read "Sepideh", written over a horizontal line.

Sepideh Ghajar

EXHIBIT 7

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**DECLARATION OF MOHAMMED JAHANFAR IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Mohammed Jahanfar, 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 39 years old and currently reside in Tarzana, California. I am employed with AAA as an insurance sales agent.

3. I am a United States citizen of Iranian origin.

4. I am a Muslim, although I am not a practicing Muslim.

5. I immigrated to the United States on July 11, 1987. I was nine years old.

6. In 1996, two weeks after I graduated from high school, I enlisted in the United States Navy. I served in the U.S. Navy until 1999, when I was honorably discharged as an E-3. The country of Iran has refused to renew my Iranian passport since the time I served in the U.S. Navy.

7. I became a United States citizen in 2003.

8. My mother, stepfather, aunt, several cousins, and mother's uncle all live in the United States.

9. My fiancée currently lives in Tehran. She is Iranian and identifies as a Muslim, although she is not a practicing Muslim.

10. My fiancée is currently pursuing a Master's degree in international studies, English translation, and English studies. Prior to seeking her Master's degree, she worked as a brand manager in a department store. Now she is focusing on her studies and writing her thesis.

11. I have known my fiancée since childhood. When I was five and she was eight, we were playmates.

12. We reconnected a year and a half ago through social media. We began talking and met up in Dubai, United Arab Emirates (UAE). I knew that I wanted to spend the rest of my life with her, so I proposed to her, and she accepted.

13. I visited my fiancée in Istanbul in February of 2017, and in June and September I travelled to visit her in Abu Dhabi. It's taxing to travel thirteen and seventeen hours nonstop. I have suffered from deep vein thrombosis and pulmonary embolism, and I've had multiple back surgeries in the past, so flying is uncomfortable. But I'm willing to endure the long flights so I can be with the woman I love.

14. After becoming engaged, my fiancée and I engaged the services of an immigration attorney to assist us with the visa process for my fiancée to move to the United States.

15. The petition for my fiancée's K-1 visa was submitted on January 13, 2017. The petition was approved, and it was sent to the U.S. embassy in Abu Dhabi on May 23, 2017.

16. Both my fiancée and I have undergone background checks as part of the visa application process.

17. On August 15, 2017, U.S. State Department website showing the status of my fiancée's case was updated to inform us that the case was ready for an interview.

18. On September 11, 2017, my fiancée and I traveled to Abu Dhabi for the immigrant visa interview. While in Abu Dhabi, my fiancée completed her medical exam. However, when we went to the embassy for the interview, the embassy turned us away, saying that we should wait for an email from the embassy.

19. My fiancée returned to Tehran, and I returned to California.

20. Since that date, neither of us, nor our immigration attorney, has received any updates, notification, or information from the embassy.

21. I have called the embassy in Abu Dhabi multiple times seeking information about my fiancée's visa, but when I call, they will not transfer me to the consular section or provide any updates. They tell me I have to send an email.

22. I have sent multiple emails to the embassy in Abu Dhabi to check the status of my fiancée's visa, but I haven't received any responses.

23. I frequently check the U.S. State Department website for updates on her visa, but online case status has not been updated since our September 11, 2017 trip to Abu Dhabi. It still says that the case is ready for an interview.

24. I paid approximately \$4,600 in travel expenses to Abu Dhabi for my fiancé's immigrant visa interview, which ultimately did not take place. I have also paid \$2,500 in legal fees.

II. Harm From September 24, 2017 Executive Order

25. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

26. I have checked the online status of my fiancé's visa. As of the date that I signed this declaration, the status says that the case is ready for an interview.

27. To date, I have received no guidance or clarity from the Embassy or any other government entity about the impact of the September 24, 2017 Executive Order on my fiancé's visa application.

28. The Executive Orders and related guidance have caused me and my fiancé great pain.

29. I feel discriminated against. I feel that we are non-existent in this country, and treated as third-class citizens.

30. It feels like we have no rights. We are not allowed to see our loved ones, our grandparents, uncles, aunts, nieces, or nephews. The U.S. Government is separating me from my loved ones because we are from Iran.

31. I believe that in the United States we have freedom of speech, but now it feels like the Government is trying to silence us.

32. I served in the U.S. Navy because I wanted to give back to this country for allowing me to become a citizen, for allowing me to live here, and for allowing me to flee persecution and dictatorship. But now, the Government wants to stop me from bringing my fiancée here. When I signed up to serve in the Navy, I never imagined that the Government would prohibit U.S. citizens from bringing their loved ones to America. It feels like a terrible betrayal.

33. I want to build a life with my fiancée in the United States, and I am scared that, due to the September 24 Executive Order, my fiancée will be unable to receive her visa and immigrate to the United States. We will be unable to get married here and begin our life together here.

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

Executed this 2 day of ~~OCTOBER~~ 2017, in LOS ANGELES

A handwritten signature in black ink, appearing to be 'MJ' or similar, written over a horizontal line.

Mohammed Jahanfar

EXHIBIT 8

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**DECLARATION OF MOHAMMAD REZA SHAERI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Mohammad Reza Shaeri, 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 36 years old and currently reside in Lancaster, Pennsylvania. I am employed as a full-time engineer by Advanced Cooling Technologies, Inc., also in Lancaster. I have a master's degree and Ph.D. in mechanical engineering from the University of Wisconsin-Milwaukee.

3. I am an Iranian citizen and a permanent resident of the United States.

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

5. In January 2010, I left my home and family behind and came to the United States on an F-1 visa in order to pursue my education.

6. In March 2014, I received my Green Card through the National Interest Waiver program. In order to qualify for a National Interest Waiver, I had to prove that I had an advanced degree and that my research had substantial merit and importance to the national interests of the United States.

7. I have continued to live in the United States since 2010, and am a taxpayer.

8. I anticipate becoming a U.S. citizen by approximately June or July 2019.

9. In my current position at Advanced Cooling Technologies, Inc., I have successfully led several projects supported by the Navy, the Department of Energy, and other U.S. government entities.

10. I met my wife, Arezoo, in 2016 through a friend of the family. Arezoo is an Iranian Citizen, and currently studies at Massey University in Palmerston North, New Zealand. She is the recipient of a three-year Ph.D. scholarship, and plans to complete her Ph.D. in marketing and advertising by 2019.

11. In late October 2016, Arezoo visited the United States on a B-1/B-2 visa to participate in a conference related to her research. Though the trip was a brief one, we were eager to spend the rest of our lives together, so I proposed and we got married in November 2016, and we announced our marriage to our family and friends.

12. Though Arezoo's visa allowed her to remain in the U.S. for six months, she returned to New Zealand after five weeks in order to complete her studies.

13. Because I anticipated gaining U.S. citizenship at approximately the same time that Arezoo was due to complete her Ph.D. program, I did not apply for a Green Card on her behalf right away. I knew that the process would be much easier once I became a citizen, so I planned to wait until 2019 to file an application.

14. Arezoo has applied for a visa twice since the March 6 Executive Order was issued, once in April 2017 and a second time in May 2017. Each time, Arezoo paid approximately \$500 in processing fees and travel and hotel costs, as the U.S. Consulate is located in Auckland, New Zealand, hundreds of miles from where she lives.

15. Arezoo was issued a 214(b) rejection letter both times, despite the fact that she had a clean travel history and ample evidence proving her ties to New Zealand. Additionally, she had been required to submit a full background check to the government of New Zealand in order to travel there for her studies.

16. The U.S. Consulate official who issued the denials of Arezoo's most recent visa application was the same officer who had approved her visa application in 2016.

17. In an effort to expedite the processing of my wife's May 2017 visitor visa application, I reached out to my Congressman, Lloyd Smucker, with the help of my company's president, and explained that I was a job creator in his district who was being negatively impacted by the Executive Order. However, when Arezoo approached the Consular officials in New Zealand with this letter, they did not act on it in any way.

18. Given the difficulty my wife was having in getting her visa applications approved, I applied for an immigrant visa on her behalf on June 6, 2017. I have not received any communication as to how this application will be affected by the September 24 Executive Order.

II. Harm Caused by the September 24, 2017 Executive Order:

1. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of immigrant and visitor visas to Iranian citizens.

2. To date, I have received no guidance or clarity from any government entity about the impact of the September 24, 2017 Executive Order on my wife's visa application.

3. The Executive Order and related guidance have caused me and my wife great stress, confusion, and pain.

4. As a result of everything that has happened, I no longer feel at home in this country. I feel like all the years of hard work I have invested into becoming an American and contributing to this country's growth and success have been for nothing, and that the U.S. government does not value the efforts of people like me. I have trouble understanding why, even though I was awarded a Green Card specifically so that I could serve the national interests of the U.S., and have been doing so for eight years, the U.S. still views me as a threat. It is hard not to see the last eight years as having been wasted.

5. Likewise, my wife has been a law-abiding, hard-working person through her entire life, and could contribute so much to this country if she was given a chance. I wish the U.S. government would see that.

6. I feel that the recent Executive Order is telling people like me that we are not allowed to love who we want to love. We can only love people from certain countries.


7. My wife and I have not been able to see each other for many months, and the separation has been very painful for both of us. I am very worried that my wife will not be able to join me in the United States, and that I will have to leave behind everything I have worked so

hard for in order to be with her. Starting over again in another country will be extremely difficult at this point in my life.

8. The Executive Order has also made me feel isolated from my community, because I fear that other Americans see me the same way the government does, as a threat. I worry about harassment from people who have been influenced by the rhetoric surrounding the Executive Orders as well as by the Orders themselves.

I, Mohammad Reza Shaeri, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of October, 2017, in Lancaster, PA.



Mohammad Reza Shaeri

EXHIBIT 9

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

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

Plaintiffs,)

v.)

Civil Action No. 17-255

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 visa expired on June 7, 2017. My wife accompanied me on an F-2 visa for spouses of students. Her visa expired on July 30, 2017. Both of our visas were multiple- entry visas.
3. I have a valid Form I-20 that expires in 2020. It allows me to stay in the United States and study. However, if my wife or I leave the United States, we will need to apply for new visas in order to re-enter the country.

4. I do not have any family in the United States. My entire family, as well as my wife's family, lives in Iran.
5. 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 third year of my PhD program.
6. 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.
7. 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 From the January 27, 2017 Executive Order:

8. On or about December 24, 2016, my wife and I flew to Iran to visit our families.
9. 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.
10. On January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) preventing the entry of Iranian visa holders as well as others into the United States.

11. My wife attempted to board her flight on January 28, but was prevented from boarding by Turkish Airlines, citing the January 27 Executive Order.
12. 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.
13. My wife was unable to successfully board a flight and enter the United States until February 4, 2017.

III. Harm From September 24, 2017 Executive Order:

14. I am aware that President Donald Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.
15. The visas upon which my wife and I entered the United States expired this past summer. I am concerned that, if and when the September 24 Executive Order is enforced, it will make it difficult for my wife and I to re-apply for F-1 and F-2 visas.
16. As a result of this difficulty, my wife and I are currently separated indefinitely from our families in Iran. We are not making any plans to leave the United States for fear that we would not be able to renew our visas.
17. If I am forced to return to Iran for a family emergency or due to other circumstances while the September 24 Executive Order is enforced, and if any new visa application I submit is denied, I will be forced to drop out of my U.S. PhD program.
18. If I am forced to return to Iran permanently 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 thirty 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.

19. Further, my wife is currently unable to seek employment in the United States. No one will give her an interview because she does not have work authorization. We are concerned that the September 24 Executive Order prevents her from seeking work authorization or legal permanent resident status. My wife has a PhD in her field and it is a shame for her not to be able to put her degree to good use.
20. In my opinion, it is very unlikely that the ban on entry will be lifted as to individuals from Iran. The September 24 Executive Order considers Iran to have “inadequate” protocols for information-sharing and other issues. It is very unlikely that Iran and the United States will reach agreement regarding the information that needs to be provided. Thus, I believe that the prohibition on entry of Iranian nationals into the United States is in effect permanent.
21. As a result of the travel bans, my wife and I have recently begun considering leaving the United States altogether.
22. If we leave the United States, we would have to abandon the life we have started here. However, if my wife is unable to work and we are unable to travel outside of the country to see our families, we may prefer to live permanently in another country.
23. 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.

Executed this 3 day of October, 2017, in New York, New York.

/s/ John Doe #1

John Doe #1

EXHIBIT 10

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**DECLARATION OF JOHN DOE #9 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #9, 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 Iran and am an Iranian citizen.
3. For many years, it has been my dream to go to American and create a better life for myself and my family.
4. This past year, I was finally selected to receive a visa through the Diversity Immigrant Visa ("DV") program. The DV program makes up a small number of visas available

annually, drawn from random selection among all entries to individuals from countries with low rates of immigration to the United States.

5. The number of applicants to the DV program is extremely high. In 2015, the U.S. Department of State received approximately 14,418,063 online entries for approximately 50,000 available visas.

6. I was understandably overjoyed to have been selected despite such low odds, and immediately made plans to travel to Abu Dhabi, United Arab Emirates for my visa interview. My interview took place on June 7, 2017.

7. After my interview, I began to make arrangements to move. I informed my employer that I would probably be leaving very soon, and began to sell my belongings in order to help cover my travel expenses.

8. On August 13, 2017, I received an email informing me that, although administrative processing had been completed on my file, I would need to submit proof of a close familial relationship, current job, or job offer in the U.S. in order to be exempt from the March 6, 2017 Executive Order.

9. I scrambled to find a job so that I would not miss this once-in-a-lifetime opportunity to move to the United States. After two weeks of contacting everyone I could think of, I finally managed to secure a position with a car dealership in Los Angeles. I submitted proof of this job offer along with my passport to the Embassy in Abu Dhabi on August 29, 2017.

10. I was extremely surprised when, despite all my efforts to do what the Embassy asked of me in such a short period of time, my passport was returned to me with no visa inside on September 4, 2017.

11. I found out on September 8, 2017 that the State Department had hit its 50,000 visa quota. A few weeks later, on September 24, 2017, I learned that President Trump had issued another Executive Order with different requirements than the March 6 Order. I do not know what this means for my case, and fear that I have lost my chance to immigrate to the United States forever, even though I followed all the rules and did everything I was supposed to do.

12. I am aware of approximately 189 other Iranian DV lottery winners who have also cleared administrative processing, but have been prevented from receiving visas because of the Executive Orders.

II. Harm Caused by the September 24, 2017 Executive Order:

13. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

14. The Executive Order and related guidance have caused me confusion, stress, and financial damage.

15. To date, I have received no guidance or clarity from the Embassy or any other government entity about the impact of the September 24, 2017 Executive Order on my visa application.

16. I fear that all of my hard work in putting together an application, travelling to Abu Dhabi, and making arrangements to move have been wasted. I feel like every time I do what the rules require of me, the rules change.

17. I love America and it has always been a great desire of mine to go there, but this process has been extremely painful for me, and I am beginning to feel as though the government of the United States does not care about people like me.

18. 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 for participating in this action.

I, John Doe, 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 1 day of October, 2017, in Arak, Iran.

/s/ John Doe #9

John Doe #9

EXHIBIT 11

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

Pars Equality Center,)	
Iranian American Bar Association,)	
Public Affairs Alliance of Iranian Americans,)	
Inc.)	
<i>et al</i> ,)	
)	
<i>Plaintiffs</i> ,)	
)	
v.)	Civil Action No. 17-cv-255
)	
Donald J. Trump, President of the United States,)	
<i>et al</i> .)	
)	
)	
<i>Defendants</i> .)	

**DECLARATION OF JOHN DOE #10 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #10, 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 35 years old and currently reside in the United States. I received my Ph.D. in 2010 from a public university in the United States, and I currently work as an Assistant Professor at a different American public university.

3. I am a U.S. citizen by birth.

4. I am married. My wife is a citizen of Iran and a lawful permanent resident of the United States. She received her Ph.D. from an American public university in 2016. She is

employed as an Assistant Professor at the same American public university where I am employed.

5. We have one daughter. She was born in June, 2017 and is a U.S. citizen.

6. My wife came to the United States in 2011 on an F-1 visa to get her Ph.D. She has not returned to Iran since 2011.

7. I met my wife in October 2012. In fall 2013, I became an employee at the university where she was studying.

8. We were married in June 2014, and my wife filed for change of status to permanent resident shortly afterwards and received her green card in March 2015.

9. In 2016, she filed for the removal of condition from her green card. The application is still pending. She plans to apply for U.S. citizenship as soon as she is eligible to do so.

10. After my wife and I got married, we went to the Interests Section of the Islamic Republic of Iran at the Embassy of Pakistan in Washington, D.C. so that she could record our marriage in her Persian documents with the government of Iran.

11. However, we were told that in order to formally record our marriage in Iran, I would be required to convert to Islam.

12. We refused. Because I was not willing to convert to Islam, Iran does not recognize our marriage.

13. My wife is considered a single woman under Iran's law, and our child is considered born out of wedlock.

14. Because of this, my wife does not feel safe returning to Iran. Even if she returned to Iran, she could not bring our baby or me with her, because our marriage is seen as illegitimate.

15. Last year, my wife began attending church. On Easter, she was baptized at an Episcopal church and converted to Christianity. I was her witness at the ceremony.

16. If she discloses to the Iranian government that she has converted to Christianity, they can recognize her marriage to me, another Christian. However, she will be guilty of converting from Islam to Christianity, which will make it very dangerous for her to return to Iran.

17. My wife and I feel that there is no safe way for my wife and my daughter to visit Iran. Thus, the only feasible way for my wife to see her parents and my daughter to meet her grandparents is for them to visit the United States.

18. My parents-in-law have visited the United States once before, in 2015.

19. In fact, my parents-in-law frequently travel outside Iran, and have made many trips to Europe. They never have problems getting visas to travel because my mother-in-law has a good job, my father-in-law has a good retirement pension, and they own a lot of property in Iran.

20. The purpose of my parents-in-law's 2015 visit was to celebrate our marriage and attend their daughter's wedding ceremony.

21. My wife and I got married at the justice of the peace office in June 2014. We delayed having a formal wedding celebration because we wanted to be sure my parents-in-law would be able to attend.

22. For that trip, my parents-in-law had an interview in February 2015, and they received their tourist visas in May 2015. They arrived in June 2015, two weeks before our wedding and left 5 days after the wedding.

23. My wife and I are hoping my parents-in-law can visit again to see us and meet their first and only grandchild, my daughter. We were originally hoping they would be able to be here for her birth.

24. We filed a DS-160 application in November 2016 so that my parents-in-law could visit the United States on a tourist visa. The first available visa appointment at the U.S. consulate in Dubai was in late April, 2017.

25. On January 27, 2017, we learned that President Trump signed an Executive Order (January 27 Executive Order) immediately prohibiting the issuance of visas to Iranian citizens, and preventing the entry of Iranian citizens into the United States.

26. Because of the January 27 Executive Order, the U.S. consulate in Dubai canceled my parents-in-law's visa appointment.

27. My wife had an emotional meltdown, not knowing what would happen or whether she would be allowed to see her parents. I was also scared, hurt, and afraid of what could happen because I did not know whether I would be allowed to see my parents-in-law and be with my wife's family again. It was devastating to me, my wife, and my family, because my wife was 19 weeks pregnant and the stress could hurt her and harm the baby.

28. After the January 27 Executive Order was enjoined by the courts, the consulate rescheduled the appointment.

29. My parents-in-law had their visa interview at the U.S. consulate in Dubai in April 2017. They told the consular officer that they were hoping to be in the United States for the birth of their grandchild. The officer gave them a "purple slip" that, according to the officer, meant the administrative processing phase would take only two-to-ten weeks. Although she said she

couldn't promise anything, she told them that because she wrote in their file that they were hoping to be here for the birth of their grandchild, their application might be expedited.

30. Since then, my parents-in-law have not received any updates about the status of their visa application.

31. When my daughter was born in June 2017, my parents-in-law were unable to be there for the birth because they had not received their visas.

32. It has been really hard not having my parents-in-law here since my daughter was born. Because neither my wife nor I had been employed by our current employer for a full year before my daughter's birth, neither of us were eligible for parental leave. If my parents-in-law had been here, they could have helped us care for the baby after she was born.

33. None of my wife's other close relatives live in the United States. My parents both live and work in another state across the country. My mother was able to visit briefly, but we needed my wife's parents here to help her recover from the childbirth and take care of the newborn.

34. My parents-in-law Skype with my daughter every morning. We want them to be able to meet and hold her. She is their only grandchild.

35. I contacted the offices of the U.S. Senators from our state, as well as my congressional representative. I never heard back from the U.S. Senators. The representative's staff told me that they could not help with a visa application that is in administrative processing.

36. My wife has emailed the U.S. consulate in Dubai every month since April. She always receives the same automatic reply. The automatic reply informs us that the application is in administrative processing and that the embassy will contact us if they need any information. At first, her emails were very detailed; I used to edit all her emails to the embassy, so I have the

complete knowledge of the contents. No matter how detailed her emails, she never received a response from a human; only an automatic reply.

37. We have also called the U.S. consulate in Dubai. We were only able to reach a helpline that gave us the address of their website and how to email the consulate. We were not able to get any information about the status of the visa application.

II. Harm From September 24, 2017 Executive Order

38. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

39. I have checked the online status of my parents-in-law's visa application. As of the date that I signed this declaration, the status says, "administrative processing."

40. To date, we have received no guidance or clarity from the Embassy or any other government entity about the impact of the September 24, 2017 Executive Order on my parents-in-law's visa application.

41. The Executive Order has caused me and my family great emotional distress and heartache.

42. My daughter is now four months old. She has not met her grandparents. Whenever my wife remembers the fact that her parents have not been allowed to meet or hold our daughter, she feels completely heartbroken, and I feel completely helpless. I feel that there is nothing I can do to ease her pain, which is heartbreaking for me.

43. I feel discriminated against. I feel like my family has fewer rights than other families. My daughter is a U.S. citizen and should have the right to see her grandparents. I am a U.S. citizen and should have the right to marry whomever I want, regardless of their country of origin, and have a normal life, with all the rights other American families have.

44. I feel hurt and betrayed. My wife loves the United States. She always attends my family's elaborate 4th-of-July celebration in Massachusetts and proudly sings the national anthem as we raise the American flag in celebration of Independence Day. This country gave my wife her education, her husband, and her daughter. This country offers security and freedom for our child. I was born in the United States; my ancestors came to this country on the Mayflower. I can't believe that the country that I love would keep my wife and I from her parents and prevent my daughter from meeting her grandparents. I can't believe that my country would unfairly cause my family so much distress and pain.

45. Going back to Iran is not viable for my family. It is not safe for my wife, or me, or my child. Consequently, if my parents-in-law cannot come to the United States, it may not be possible for my wife to see them. This is emotionally devastating for my entire family.

46. I feel like my wife, and by extension our family, is being profiled. The Government assumes that because my wife is from Iran, she is a Muslim terrorist, and that because I married a woman born in Iran, I should undergo hardship and distress. It feels like the Government is punishing my family because of its assumptions. They are wrong. We are Christians, and we are not dangerous.

47. My wife and I are good people. We are educators, teaching children in college. We have always abided by the law. My wife is respectful of all U.S. law and norms. She has never even had a speeding ticket. It feels like the only thing I've done wrong is to marry a person born in the wrong country, and the only thing my wife did wrong was to be born in the wrong place. I feel like the government is victimizing me and my family because of something my wife had no control over.

48. Every time we think or talk about the Executive Order we become emotional. My life has become difficult because sometimes my wife can't stop crying. This is severely affecting our family. Stress affects my wife's milk supply and is affecting my daughter's well-being. I am scared about what will happen to my wife, my family, and my in-laws in the future. I fear that my parents-in-law will never be able to visit us in the United States or meet my daughter.

49. 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 parents-in-law for participating in this action.

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

Executed this 2 day of October, 2017, in United States of America.

/s/ John Doe #10

John Doe #10

EXHIBIT 12

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**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. 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 29 years old and currently reside in San Diego, California. I am employed with the County 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 I, 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 and has 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's to move to the United States.

10. My fiancé has a sister who lives in Boston, Massachusetts. His sister originally came to the United States on an F-1 visa and earned her PhD. She is currently working in Boston and has Optional Practical Training (OPT) work authorization.

11. I began to work on my fiancé's petition for a K-1 visa in December 2015. The petition for his K-1 visa was submitted in February 2016 and was approved in April 2016. The case was created in May 2016.

12. We did not include documentation about my fiancé's sister in his K-1 visa application. We included only the required information, which was documentation about my fiancé and about me.

13. In October 2016, my fiancé and I traveled to Abu Dhabi for the immigrant visa interview. During the interview, the consular official asked my fiancé whether he had any family in the United States. My fiancé replied that he had one sister, and showed the consular official her photograph.

14. At the conclusion of the visa interview, the consular official told us, “congratulations! Your case has been approved.”

15. The consular official then notified us that my fiancé’s visa needed to undergo administrative processing, which he described as “routine.” He advised that administrative processing could take up to six months.

16. Based on the consular official’s verbal assurance, my fiancé and I both believed that his visa had been adjudicated and approved, and would be issued pending the routine completion of administrative processing.

17. I paid approximately \$5,000.00 in travel expenses to Abu Dhabi for my fiancé’s immigrant visa interview. I also paid approximately \$3,500.00 in legal fees for his visa application.

18. I have personally checked the U.S. State Department website every day since October 2016 for status updates on my fiancé’s visa.

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

19. I learned that President Trump signed an Executive Order on January 27, 2017 (January 27 Executive Order) immediately prohibiting the issuance of visas to Iranian citizens, and preventing the entry of Iranian citizens into the United States.

20. After the January 27 Executive Order took effect, I 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 would be issued in course or whether it would not be issued under the terms of the January 27 Executive Order.

21. In the weeks that followed the issuance of the January 27 Executive Order, I checked various internet websites and blogs every day in an attempt to gather further information about the issuance of visas.

22. I called the U.S. Embassy in Abu Dhabi. However, they did not provide me with any information on my fiancé's visa.

23. I called U.S. Senator Kamala Harris in hopes that her staff could help move my fiancé's case along, or at least provide me with information on its status. However, her staff was unable to help me.

24. After the January 27 Executive Order, I was extremely anxious, stressed, unable to sleep and eat, and nervous because it was unclear whether I would be able to be reunited with my fiancé and get married.

III. Harm From March 6, 2017 Executive Order:

25. I understand that President Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

26. At that time, the online status of my fiancé's visa application stated that the visa was in "administrative processing."

27. I reached out again to Senator Kamala Harris's office for her help. On March 10, 2017, the Senator's staff made an inquiry to the U.S. Embassy in Abu Dhabi on my behalf. Senator Kamala Harris's staff asked whether my fiancé could apply for any type of expedited

processing, or whether any other avenues were available to him. The Embassy said that no such options were available.

28. On March 12, the automated date stamp in the online system tracking my fiancé's visa application was updated. I believe that this indicated that someone reviewed my case on March 12th. However, its status remained in "administrative processing."

29. Senator Kamala Harris's office assured me that they would reach out again to the Embassy on my behalf in June 2017, ninety days after their first inquiry to the Embassy.

30. In order to be eligible to travel to the United States, my fiancé had to undergo a medical exam. His medical exam expired on April 21, 2017, while we waited for his visa to be issued. He will need to undergo a new medical exam in order to enter the United States.

31. Prior to the January 27 and March 6 Executive Orders, my fiancé and I had been planning an extravagant wedding ceremony in the United States that was scheduled for 2018.

32. I had spent hundreds of hours planning my wedding and I executed contracts and paid \$2,500.00 as a down payment to secure a wedding venue.

33. In May 2017, an additional \$2,500.00 down payment was due to our chosen wedding venue. By that time, seven months after his visa interview, my fiancé's visa was still stuck in "administrative processing." The wedding venue would not allow us to change the date of our wedding, so I was forced to forfeit the deposit I had made, as well as my reservation of the wedding venue.

34. I had to notify my friends and family that my wedding was cancelled.

35. I was extremely distraught about everything that was happening with my fiancé's visa process. I was not able to make any life plans while we both wait, in limbo, for his visa to be

issued. I did not know when, if ever, we would be able to be married. My fiancé and I were desperate to begin our life together.

36. I later learned that the March 6 Executive Order was enjoined by a federal court. My fiancé and I had been saving money, and we began the process of looking for a house that we could purchase in the United States. We hope to live in that house when he arrives here.

37. On June 26, 2017 I learned that, as a result of a decision by the United States Supreme Court, the March 6 Executive Order could be enforced against individuals who seek entry to the United States and who do not have a “bona fide relationship” with a person or entity in the United States

38. Early on June 29, 2017, I learned from news reports that the U.S. Department of State issued guidance that defined “close family” to exclude fiancés. I was beside myself with grief and didn’t know what to do. Only later that day did I learn that the U.S. government had abruptly changed course and issued new guidance defining “close family” to include fiancés.

39. I received no guidance or clarity from the Embassy or any other government entity about the impact of the Supreme Court order or guidance on my fiancé’s visa application.

40. I checked the online status of my fiancé’s visa on the morning of June 29, 2017. The status said, “administrative processing.”

IV. Harm From September 24, 2017 Executive Order

41. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

42. I have checked the online status of my fiancé’s visa. As of the date that I signed this declaration, the status says, “administrative processing.”

43. To date, I have received no guidance or clarity from the Embassy or any other government entity about the impact of the September 24, 2017 Executive Order on my fiancé's visa application.

44. The Executive Orders and related guidance have caused me and my fiancé great pain.

45. I feel violated. During the seventeen years that I have lived in this country, I have always tried to be a law-abiding person. I have always followed all rules and policies and never done anything wrong, never gotten into trouble. I've always tried to be a helpful person, regardless of who I am helping.

46. It feels like the U.S. Government is profiling me. The Government assumes that, because my family is Persian, and from Iran, that we are Muslim, and so we must be dangerous. My fiancé and I are Muslim, but we are anything but dangerous.

47. In fact, I have worked for the city and state government in California for years. I have passed background checks and been fingerprinted a number of times. There is nothing suspicious or dangerous on my record.

48. The Government's actions make me feel that, despite my service and work in this country, I don't count for anything. They make me feel like I don't have a voice.

49. I am very scared about what will happen in the future. I have no faith that the government of Iran will cooperate with the United States to provide more information. And if that occurs, what will happen to people like me and my fiancé?

50. I fear that, due to the September 24 Executive Order, my fiancé will be unable to receive his visa and immigrate to the United States, and that we will be unable to get married and

begin our life here. We opened escrow on our house in September 2017. I fear that our savings and plans to purchase a family home will come to nothing.

51. You only get one life in this world. I feel like mine is crashing down around me.

52. 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 27 day of September, 2017, in San Diego, California.

/s/ Jane Doe #1

Jane Doe #1

Exhibit to Declaration of Jane Doe #1

From: [REDACTED]
Sent: Wednesday, September 27, 2017 2:36 PM
To: Joanna Wasik
Subject: [REDACTED]

Hi Joanna,



Screen shot of the CEAC website:

EXHIBIT 13

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

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

Plaintiffs,

v.

Civil Action No. 17-255

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 obtaining 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, in 2017.

5. My parents applied for tourist visas at the U.S. Embassy in Istanbul, Turkey in November 2016.

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

6. On January 27, 2017, President Trump issued an Executive Order (January 27 Executive Order) restricting the issuance of visas to Iranian citizens, and preventing Iranian immigrants and nonimmigrants from entering the United States.

7. I was instructed by my immigration attorney not to travel outside of the United States because of the January 27 Executive Order. I had been 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.

8. The Executive Order also put into jeopardy the plans of my parents to visit me in the United States.

III. Harm from March 6, 2017 Executive Order

9. I understand that President Donald Trump signed an Executive Order on March 6, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

10. The terms of the March 6 Executive Order prohibited the approval and issuance of my parents' tourist visas. I was concerned that if and when the March 6 Executive Order went into effect, my parents' tourist visas would be denied and they would be unable to travel to the United States.

11. My parents called the U.S. Embassy in Ankara but were not able to receive any information about their tourist visa. We also checked the status of their visa application online but there were no updates — the visas remained in “administrative processing.”

IV. Harm From September 24, 2017 Executive Order

12. I understand that President Trump issued an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

13. I checked the online status of my parents' visa. As of the date of this declaration, the status is “administrative processing.”

14. I have not seen my parents since I left Iran in August 2013.

15. 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. I am unable to visit my parents in Iran because it is unsafe for me to return there. If and when the September 24 Executive Order is enforced, I will face indefinite separation from my parents and the rest of my family.

16. I feel like I am in prison.

17. I am extremely worried that I will not be able to see my parents. I constantly reconsider my decision to flee persecution in Iran and settle in the United States. At times, I am critical of the choice I have made. I have actually thought about going back to Iran — and risking my life — so that I can see my parents. The Executive Orders have forced me to re-

evaluate my priorities constantly; is it more important for me to be near my parents? Or is it more important for me to live in the United States and be physically safe?

18. I have been incredibly sad recently.

19. 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, and about retaliatory actions affecting my parents' visa application.

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

Executed this 2 day of October, 2017, in San Francisco, California.

/s/ Jane Doe #4

Jane Doe #4

Exhibit to Declaration of Jane Doe #4

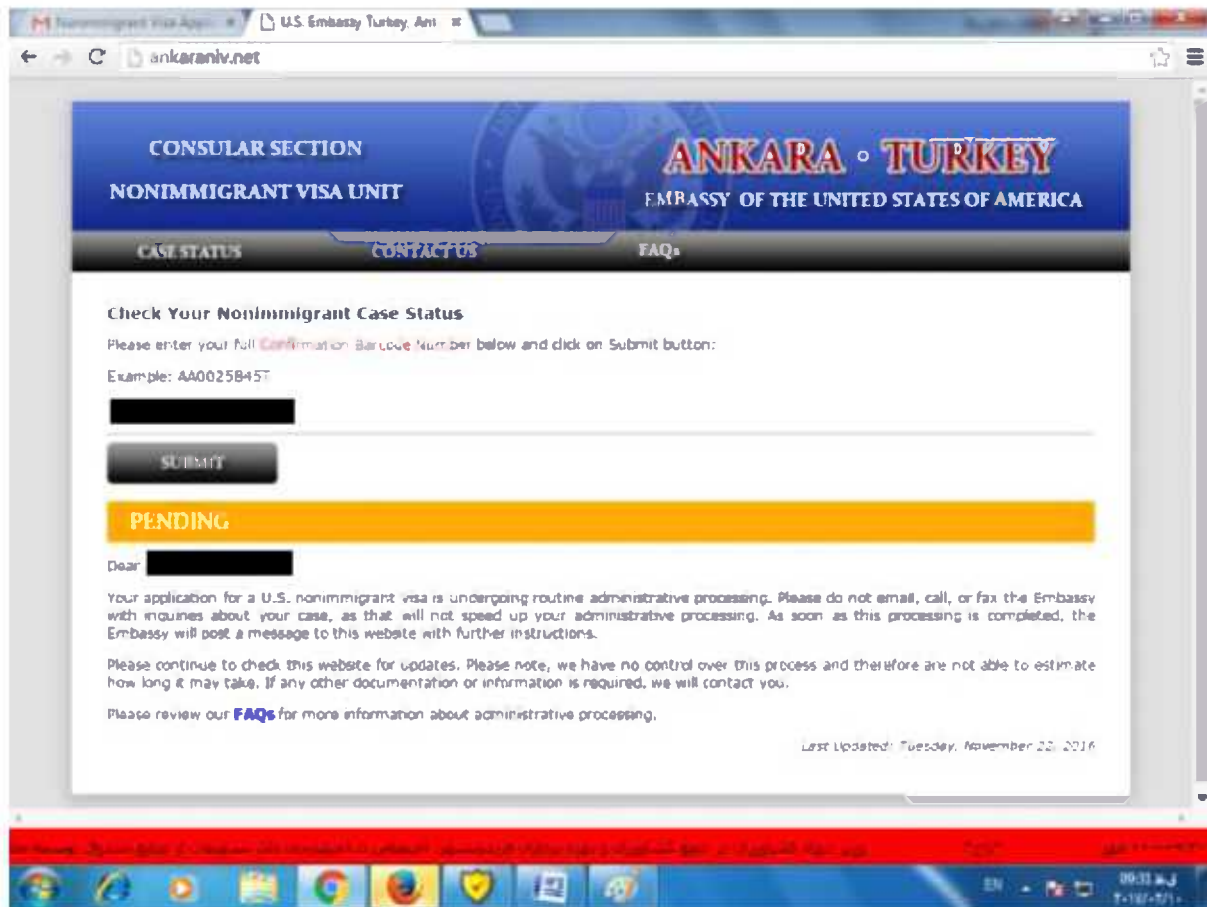


EXHIBIT 14

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

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

Plaintiffs,

v.

Civil Action No. 17-255

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

Defendants.

**DECLARATION OF JANE DOE #13 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #13, 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 and lawful permanent resident of the United States. My parents and sister are also Iranian citizens and live in Iran.

3. I am a Muslim. My parents and sister are also Muslim.

4. I grew up in Iran and completed my undergraduate education there. I was a political activist during the Green Movement in Iran.

5. I first arrived in the United States in 2010 on an F-1 student visa in order to enroll in a graduate degree program. While working toward my graduate degree, I learned that the government of Iran had tried and convicted me in absentia on the basis of my previous political actions. As a result, I am unable to ever return to Iran.

6. I received asylum in the United States in December 2011. I am presently eligible to seek U.S. citizenship.

7. My parents have visited me in the United States twice in the past seven years. My mother and father both visited me in 2011, and my mother visited me in 2014 as well.

8. Each time my parents intended to visit the United States, I provided them with, among other things, documentation of my legal status as an asylee as well as a letter of invitation. They submitted these documents along with their visa application. My parents successfully applied for and received tourist visas from the U.S. Consulate in Dubai in 2011 and my mom successfully applied for and received a tourist visa from the U.S. Consulate in Dubai in 2014.

9. The officials at the U.S. Consulate in Dubai did not ask my parents any questions about my religion or their religion in either 2011 or 2014.

10. After I became engaged to be married to a U.S. citizen, my parents planned to come to the United States for my wedding. I greatly looked forward to seeing them and began making plans for my wedding ceremony. I expected that they would be able to obtain tourist visas as they had done in the past.

11. My parents applied for a tourist visa. This time, I provided them with far more supporting documentation than I had provided for their visa applications in either 2011 or 2014. My fiancé's parents, who are U.S. citizens by birth and not of Iranian descent, provided my parents with letters of invitation, as did my fiancé. I provided them with a letter of invitation, documents showing my finances, and documents evidencing my legal status as an asylee and lawful permanent resident, among other things. My parents received an appointment date for their visa interview.

II. Harm Suffered Under January 27, 2017 Executive Order

12. I am aware that on January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) immediately restricting entry into the United States for citizens from certain countries, including Iran.

13. My parents received an email stating that their visa appointment had been cancelled. After a federal court preliminarily enjoined the January 27 Executive Order, my parents' appointment was rescheduled.

14. After the federal court's preliminary injunction of the January 27 Executive Order but before President Donald Trump signed a new Executive Order on March 6, 2017 (March 6 Executive Order), my parents traveled to Dubai for their appointment and interview.

15. In response to the questions of the consular officials, my parents said that they were traveling to visit me for my wedding, and that I was an asylee and lawful permanent resident of the United States.

16. My parents reported to me that the consular officials became visibly upset when they heard that I was an asylee. They then asked my parents if they intended to apply for asylum. My parents assured the consular officials that they did not intend to apply for asylum; that they

had successfully obtained tourist visas in the past; that they had returned to Iran each time after visiting me in 2011 and 2015; that they had every intention of returning to Iran after my wedding; that they were happy with their life in Iran; and that their other daughter, my sister, lived in Iran.

17. The consular officials stated that they did not understand how I had entered the United States and that I was not “in the system.”

18. The consular officials then asked, “what is your daughter’s religion?”

19. My parents were surprised because they had never before been asked a question about religion during a tourist visa interview. They replied that I was a Muslim.

20. At the conclusion of the interview, my parents’ application for a tourist visa was denied. The consular officials gave no basis for the denial.

21. My mother informed me that a couple who were in a substantially similar position— also applying for a tourist visa to a visit a relative and asylee in the United States — were approved for a tourist visa on the same day that my parents’ tourist visa was denied. The other couple was being interviewed next to my parents. Their interview, like that of my parents, was conducted in Farsi and my mother was able to overhear the couple’s responses to the interviewer’s questions. My mother gleaned from their conversation that there was one significant difference between their application and hers: the other couple were Armenian Christians, while my parents are Muslim.

III. Harm from March 6, 2017 Executive Order

22. I am aware that President Donald Trump signed an Executive Order on March 6, 2017 prohibiting the issuance of visas to Iranian citizens.

23. In the wake of the March 6 Executive Order, I lost hope that my parents would be able to reapply for a tourist visa to travel to the United States for my wedding. My fiancé and I were forced to postpone our wedding plans and contemplate significant changes to the ceremony.

IV. Harm from September 24, 2017 Executive Order

24. I am aware that President Donald Trump signed an Executive Order on September 26, 2017 prohibiting the issuance of visas to Iranian citizens (September 24 Executive Order).

25. If and when the September 24 Executive Order is enforced, my parents will be unable to re-apply for and receive a tourist visa.

26. It is not possible for me and my fiancé to get married in Iran because it is not safe for me to return to Iran. We are unable to host our wedding in the United States because my parents will be unable to attend. As a result of the March 6 and September 24 Executive Orders, my fiancé and I have been forced to reschedule our wedding and look for a wedding venue in Europe. This venue change will require both my family and my fiancé's family to travel abroad to be with us on our wedding day.

27. I am also very worried about the future. The thought that I will be unable to host my parents in my home in the future is crushing. My parents are getting older, and I would like to be able to live physically close to take care of them. Until now, I had hoped that they would be able to apply for immigrant visas and live with me in the United States. In the future, my parents will be too old to travel to a third country, in Europe or elsewhere, to meet me.

28. Based on the way that the iterations of the travel ban have evolved, I feel like it is a policy that has been developed to intentionally target Iranians and individuals of other nationalities. Over the past months, I have begun to wonder whether I will ever be allowed to feel at home in the United States.

29. If I am forced to choose between living close to my parents and living in the United States, I may well choose to leave the United States. I am starting to think that, if it means indefinite separation from my family, living in the United States is just not worth it.

30. 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 my involvement will impact any future visa applications by my family or my imminent naturalization proceedings.

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

Executed this 3 day of October, 2017, in Washington, District of Columbia.

/s/ Jane Doe #13

Jane Doe #13

EXHIBIT 15

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**DECLARATION OF JANE DOE #14 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #14, 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 34 years old and currently reside in New York City. I play the viola professionally as a classical musician, and I am working on my Ph.D. in performing arts at Stoney Brook University.

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

4. I am a Muslim, although I am non-practicing.

5. I came to the United States in 2011 and became a citizen in April 2016.

6. I am married. My husband is an Iranian citizen and a lawful permanent resident of the United States.

7. I am pregnant with our first child. The baby is due in November 2017.

8. My mother lives in Iran. She is applying for an immigrant visa to move to the United States.

9. I first submitted the petition for her visa in November 2016.

10. In late May or early June 2017, I sent a letter to the U.S. embassy in Abu Dhabi advising them that I was pregnant and requesting that they expedite the date of her interview.

11. On August 28, 2017, my mother had her immigrant visa interview at the U.S. embassy in Abu Dhabi.

12. After the interview, we were advised that the visa needed to undergo administrative processing. I have heard that administrative processing can take several months.

13. I have personally checked the U.S. State Department website for status updates on my mother's visa.

II. Harm From September 24, 2017 Executive Order

14. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens.

15. I have checked the online status of my mother's immigrant visa. As of the date that I signed this declaration, the status says, "administrative processing."

16. To date, I have received no guidance or clarity from the Embassy or any other government entity about the impact of the September 24, 2017 Executive Order on my mother's visa application.

17. The announcement about the Executive Order has caused me terrible emotional distress.

18. When I found out about the Executive Order, I was so, so depressed. I don't know what to do. I am going to have a baby in a few months, and I need my mother.

19. My husband works full time and has to be at work every day. He won't be able to stay home with me and the new baby. None of my other close relatives live in the United States, and I don't have any other family close by that can help with the newborn.

20. I need my mother here so she can support me and help me care for the baby.

21. Before learning about the Executive Order, I was so hopeful that my mother would be able to come to the U.S. and meet her grandchild. I want my mother to see the life I've built here with my husband. Now I'm afraid that won't be able to happen.

22. This feels like the most horrible thing that could happen to a person. I can't believe the Government is saying I don't have the right to be with my family. Even though I am a United States citizen, it feels like I don't have any rights at all.

23. 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 mother for participating in this action.

I, Jane Doe #14, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 2 day of October, 2017, in New York, New York.

/s/ Jane Doe #14

Jane Doe #14

EXHIBIT 16

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

Pars Equality Center,
Iranian American Bar Association,
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. 17-cv-255

**DECLARATION OF JANE DOE #15 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #15, 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 was born in Iran. I am a dual citizen of Iran and the United States.

3. I received a bachelor's degree and a Master's degree from the best university in Iran. I received another Master's degree from an institution in Europe. At each university which I attended, I have been one of only a few individuals admitted to my program of study.

4. I first came to the United States in 2009. When I completed my second Master's degree in 2012, I moved to the United States to live here with my husband.

5. I work in the biotech field. I hold a top position in an elite company.

6. My job is very fast-paced. Although I receive vacation time, I am rarely able to take vacation because my job is so demanding.

7. Since moving to the United States, I have traveled to Iran to visit my parents approximately every 1.5 years. It is not easy for me to do so — I save up most of my vacation time and, as a result, end up not taking many vacations with my husband. Iran is far away and it is not worthwhile to visit for only a short period of time, such as one week. I have seen my parents for approximately three months total over the past seven years; this is not enough time.

8. My parents are ageing. My father is over seventy years old and my mother is in her sixties. My greatest fear is that one day I will receive a phone call saying that something has happened to them, and I will not be by their side.

9. In 2015, I became a U.S. citizen. I was tremendously excited on that day.

10. I knew that, because I was a U.S. citizen, I could now submit a petition for an immigrant visa on behalf of my parents. I was ecstatic at the thought. I applied for an immigrant visa, which would allow my parents to receive a green card, in May 2016.

11. My husband and I shortened our lease to move out of our one-bedroom apartment and into a two-bedroom apartment in anticipation of my parents' arrival.

12. Then the January 27, 2017 and March 6, 2017 Executive Orders were signed. I was devastated because I knew it meant that my parents would not be coming to the United States.

13. After the March 6 Executive Order was enjoined by a federal court, my parents' visa appointment was scheduled. They completed their visa interview in August 2017 at a U.S. Embassy in a Middle Eastern country. I started again to get excited for their arrival. I thought of

all of the food I would serve them when they came, and which bottles of wine we would open to celebrate. I began to plan which restaurants I would take them to.

II. Harm From September 24, 2017 Executive Order

14. I understand that President Trump signed an Executive Order on September 24, 2017 (September 24 Executive Order) prohibiting the issuance of visas to Iranian citizens. I understand that, if and when it is enforced, the September 24 Executive Order would block issuance of my parents' immigrant visas.

15. I haven't seen my parents for over a year. I have been planning for them to come live with me in the United States for much longer than that.

16. The January 27, March 6, and September 24 Executive Orders have made me completely depressed. Each time my husband and I get ready for my parents to come here, another hurdle is thrown in our way. When someone at work asks me where my "home" is, I feel completely confused. Even though I am a U.S. citizen, that fact makes no difference. I'm not sure which country is mine. It feels like no one wants me here.

17. I've started going to therapy to deal with anxiety stemming from the separation from my parents as well as the wholly unpredictable nature of the Executive Orders. It seems that something new happens every two to three months. My husband and I shortened our lease so that we could move to a two-bedroom apartment when my parents arrived. However, when the January 27, March 6, and now September 24 Executive Orders were signed, we again extended our original lease on our one-bedroom apartment. Each time we extend the lease, we end up paying a higher rent due to market increases. Out of self-preservation, I've had to tell myself not to get excited for my parents' arrival, not to make any plans for it, and to just let it go.

18. I've started to look for jobs in other countries. However, my husband has to stay in the United States for his job. My husband and I are seriously considering living separately — he in the United States and me in another country — so that I am able to see my parents on a regular basis. My husband has been incredibly supportive of me throughout this process, but I worry about the strain on our marriage that any separation from him could cause.

19. I have joined this lawsuit as an anonymous Plaintiff because I am afraid that the government agencies listed as Defendants will take retaliatory action against me or my parents for participating in this action.

I, Jane Doe #15, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 2 day of October, 2017, in San Francisco, California.

/s/ Jane Doe #15

Jane Doe #15