

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juweiya Abdiaziz ALI; A.F.A., a minor; Reema
Khaled DAHMAN; G.E., a minor; Ahmed
Mohammed Ahmed ALI; E.A., a minor; on
behalf of themselves as individuals and on
behalf of others similarly situated,

Plaintiffs-Petitioners,

vs.

Donald TRUMP, President of the United States
of America; U.S. DEPARTMENT OF STATE;
Tom SHANNON, Acting Secretary of State;
U.S. DEPARTMENT OF HOMELAND
SECURITY; John F. KELLY, Secretary of
Homeland Security; U.S. CITIZENSHIP AND
IMMIGRATION SERVICES; Lori
SCIALABBA, Acting Director of USCIS;
OFFICE OF THE DIRECTOR OF NATIONAL
INTELLIGENCE; Michael DEMPSEY, Acting
Director of National Intelligence,

Defendants-Respondents.

Case No.: 2:17-cv-00135-JLR

**DECLARATION OF
JAFFER AKHLAQ HUSSAIN
IN SUPPORT OF PLAINTIFFS**

1 I, Jaffer Akhlaq Hussain, declare under penalty of perjury as follows:

2 1. I am a United States lawful permanent resident. I live in Parlin, New Jersey. I am
3 employed as a Software Developer specializing in the development and implementation of
4 Microsoft ERP (Enterprise Resource Planning) software.

5 2. I was born in Karachi, Pakistan on November 3, 1980, and I am now 36 years of age. I
6 came to the United States in August 1999 as an F-1 student to attend the University of
7 Wisconsin. I was awarded the degree of Bachelor of Science in Electrical Engineering in
8 December 2003. I continued my studies at Northeastern University in Boston, Massachusetts. I
9 was awarded the degree of Master of Science in Engineering Management in January 2008. I
10 was granted a change of status to H-1B on October 1, 2008. My previous employer Fullscope,
11 Inc. sponsored me for permanent residence. My application was approved by USCIS, and I
12 became a permanent resident of the United States on October 2, 2013.

13 3. I am married to Seyedehfatemeh Hamedani ("Fateme"), a citizen of Iran. Fateme holds
14 the degree of Master of Science in Biotechnology. My family and her family are friends, and I
15 have known Fateme from childhood. Beginning in 2012, we began to get to know each other
16 better by chatting through Skype and Facebook. We saw each other in person at my sister's
17 wedding in Pakistan. We realized we were strongly attracted to each other. We decided to marry,
18 with the enthusiastic support of both of our families. Fateme and I were married in Karachi,
19 Pakistan on January 8, 2015. Both Fateme and I are Muslims, and our marriage was celebrated
20 in accord with Muslim traditions.

21 4. Immediately after our marriage I contacted my immigration lawyer in the United States,
22 and filed an I-130 Immigrant Relative Petition on behalf of Fateme on April 15, 2015. The
23 petition was approved on November 13, 2015, and forwarded to the National Visa Center. The
24 petition could not be processed further at that time due to the limited number of visas available
25 annually to the spouses of U.S. permanent residents. While we were waiting for visas to become
26 available, Fateme continued to live in Iran. We visited as often as possible given the constraints
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1 of my employment in the United States. Fatemeh became pregnant with our child. On July 2,
2 2016 we were greatly blessed with the birth of our son Ermiya Syed. Our son is now seven
3 months old. He lives with his mother in Iran.
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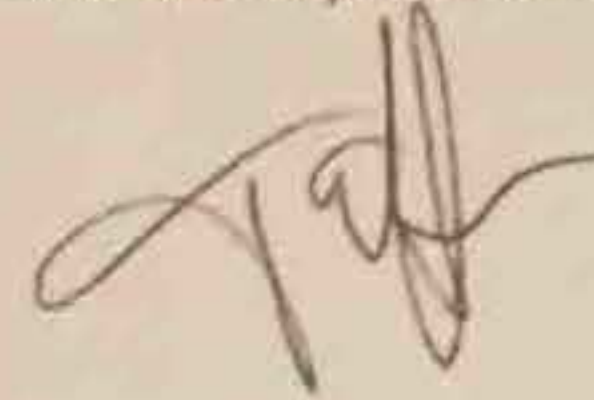
5 5. Around this same time, priority dates had advanced to the point where we were able to
6 pay our visa application fees, file our DS-260 visa application, and submit our civil documents
7 and Affidavit of Support to the National Visa Center. This required great effort on my part
8 including a trip to Pakistan to obtain a passport for our son, as my son is a citizen of Pakistan
9 under Pakistan law. Eventually, all of the necessary documents were obtained, and were
10 submitted to the National Visa Center on January 30, 2017.

11 6. On February 1, 2017 Fatemeh's priority date became current according to the February
12 2017 Visa Bulletin. This means Fatemeh and Ermiya are now eligible to obtain a visa
13 appointment at the U.S. consulate in Abu Dhabi, obtain their immigrant visas, and proceed to the
14 United States. However, due to the Executive Order issued on January 27, 2017, it is no longer
15 possible for my wife and child to obtain a visa appointment or immigrant visas.

16 7. I have been separated from my wife since our marriage, and I have been separated from
17 our son since his birth. There is no practical place for us to live except the United States. It
18 would be very difficult for me to live with my family in Iran, since I am not a citizen of Iran, and
19 I could not own property or hold civil rights of any kind in Iran. There would be limited if any
20 opportunity to pursue my profession in Iran. It would also be very difficult for our family to live
21 in Pakistan. My family are Shia Muslims, which is a minority in Pakistan. My brother was a
22 member of the National Assembly of Pakistan, and received threats during most of his term.
23 These threats could well extend to myself and my family. Fatemeh wishes to pursue her
24 education in bio-sciences in the United States. We both want our son to receive his education in
25 the United States, and to become a United States citizen as we wish to do as well. All of our
26 plans are now on hold indefinitely because of the travel ban.
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct to the best of my information, knowledge, and belief.
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4 Executed on this 3rd day of February, 2017, in Parlin, New Jersey.
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8 JAFFER A. HUSSAIN
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