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4 **UNITED STATES DISTRICT COURT**
5 **WESTERN DISTRICT OF WASHINGTON**
6 **AT SEATTLE**

7 STATE OF WASHINGTON, et al.,

8 Plaintiffs,

9 v.

10 DONALD J. TRUMP, et al.,

11 Defendants.

CASE NO. C17-0141JLR

DECLARATION OF MARGARET
EVERETT

12
13 I, Margaret Everett, hereby declare and affirm as follows:

- 14 1. I am over the age of 18 and competent to testify.
- 15 2. I am employed by Portland State University (“PSU”) and serve as Vice Provost for
16 International Affairs and Dean of Graduate Studies. I have personal knowledge of the
17 facts set forth in this declaration and I am competent to testify about them.
- 18 3. Portland State University is an urban public research university located in downtown
19 Portland, Oregon. PSU’s Mission is to serve and sustain a vibrant urban region through
20 creativity, collective knowledge, and expertise. The research and teaching of PSU has a
21 global impact. PSU is dedicated to collaborative learning, innovative research,
22 sustainability, and community engagement among a diverse community of life-long
23 learners.
- 24 4. Consistent with that Mission, Portland State University has a rich and diverse student
25 body, including a significant number of international students who are an essential part of
26 the community, who add to and enhance the experience of all students, and who provide
an important part of PSU’s enrollment revenue.

- 1 5. Portland State University has a current enrollment of approximately 25,000 students, with
2 eight percent (8%), or 1929, being international students. "International students" are
3 foreign nationals studying at PSU pursuant to a U.S. government-issued visa.
- 4 6. I am familiar with the Executive Order entitled "Protecting the Nation from Foreign
5 Terrorist Entry into the United States," which I understand to temporarily bar any person
6 entering the United States who is a citizen of any of the following seven countries: Syria,
7 Iraq, Iran, Somalia, Sudan, Libya, and Yemen ("the affected countries").
- 8 7. Of the 1929 international students enrolled at PSU during the current academic term, 59
9 students are citizens of five of the affected countries: Iran, Iraq, Yemen, Libya, and Syria.
10 The 59 students are at PSU under valid student visas. I believe these 59 students, along
11 with all international students, enhance the educational experience of all students, faculty
12 and staff at Portland State University.
- 13 8. International students at PSU pay non-resident tuition and fee rates which are
14 significantly higher than in-state resident tuition and fee rates. I have consulted with the
15 University Budget Office and am informed that approximately \$33 million of Portland
16 State University's net tuition and fee revenue in academic year 2015-16 was derived from
17 international students. This amount is approximately 13% of PSU's total net tuition and
18 fees for 2015-16. This amount does not include housing or other auxiliary revenues
19 received by PSU from international students.¹
- 20 9. The implementation of the Executive Order has had a chilling effect on the PSU
21 community and a negative impact on the lives of affected international students. PSU has
22 advised the 59 affected students not to leave the country out of concern they would not be
23 able to return to resume their studies.
- 24 10. I understand that international students and their parents, as well as faculty and staff, are
25

26 ¹ I understand it is estimated that in 2015, Portland State University's international students contributed \$71.1 million to the U.S. economy, supporting 877 jobs. See NAFSA: Association of International Educators at <https://istart.iu.edu/nafsa/reports/state.cfm?state=OR&year=2015>.

1 worried about the travel restrictions generally, and specifically, for the 59 current
2 students from the affected countries. Some international students at PSU are worried
3 about their ability to travel to their home countries and then be able to return to complete
4 their studies, particularly in the event of a family or other emergency, and about the
5 ability of family members to visit or to attend significant events such as commencement.

6 11. In addition, PSU has significant partnerships with foreign universities outside of the
7 affected countries through which students can transfer to PSU and from which PSU
8 derives a significant number of its international students. I have heard from such
9 partnership universities with concerns about the safety and fair treatment of their students
10 in the United States in light of the Executive Order.

11 12. We have seen negative impacts to the personal and professional lives of persons affiliated
12 with PSU as a result of the Executive Order. For example, the Executive Order has
13 already negatively impacted a visiting researcher and a recent graduate.

14 13. The impacted visiting researcher is funded by a university in Finland but is an Iranian
15 national. This visiting researcher came to PSU from Finland in January 2016 to conduct
16 research related to water resources engineering in collaboration with faculty in PSU's
17 Maseeh College of Engineering and Computer Sciences. He returned to Finland over the
18 winter break and was scheduled to leave Europe to return to the United States on January
19 27, 2017. He was not allowed to board his flight, despite holding a valid J-1 visa. To
20 date, the visiting researcher has not returned to PSU and it is unclear at this time whether
21 he will do so, thereby depriving PSU of the important research he was conducting on our
22 campus.

23 14. The impacted recent graduate is an Iraqi national who has completed his studies and was
24 to return to Portland in order present research conducted by him and his graduate advisor.
25 If he is unable to return, he will not be able to present the research as planned. In order to
26 allow this former student and faculty member to jointly present their research, PSU
would likely bear the cost of having the research presented outside the United States in

1 order to enable the former student and faculty member to present jointly. Doing so would
2 be consistent with PSU's mission, with the dissemination of knowledge, and with
3 allowing a student to participate in the culmination of his work, although doing it outside
4 the United States deprives our community of the ability to participate. This is but one
5 example of the many ways the Executive Order is likely to impact PSU and our local
6 community if it remains in place.

7 15. In addition to current student, staff, and faculty impacts, Portland State University is
8 concerned about future negative impacts. PSU is presently in the middle of the
9 admissions season. To date, I understand PSU has received 84 applications for
10 Spring/Summer/Fall 2017 from prospective students from the seven affected countries.
11 Thirteen of those students have already been admitted, nine have been denied, and the
12 remaining 61 applications are pending an admission decision.

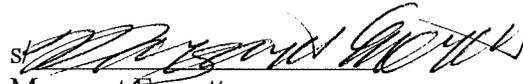
13 16. I understand two of the thirteen admitted international students from the affected
14 countries are graduate students admitted for the Spring 2017 term. The first day of the
15 Spring term is April 3, 2017. These admitted students have been issued F-1 visas, have
16 incurred the costs necessary to obtain such visas, and should be able to enter the United
17 States on or after February 25, 2017 pursuant to the terms of their visas. If the students
18 are not able to travel to the United States for the Spring 2017 term, their positions will not
19 be filled and represent lost revenue to PSU. Moreover, the loss of international graduate
20 students has a direct, negative impact on research and undergraduate teaching at PSU
21 because international graduate students often serve as graduate research assistants and
22 graduate teaching assistants at the University.

23 17. It is my understanding and belief that many of the international students we have in our
24 PSU community are provided a scholarship or other support by their home governments
25 to pursue studies in fields such as Engineering, Urban Planning and Public
26 Administration in order to contribute to rebuilding and civic improvement efforts in their
home countries after graduation. I believe that the ability of these students to create

1 positive connections and lasting ties with fellow students, the PSU community, Oregon,
2 and the United States as a whole, is in our national interest and that alienating PSU's
3 current and prospective international students runs counter to that interest. I also believe
4 that such actions are counter to the interests of PSU and its ability to fulfill its mission
5 and to its students.

6
7 I declare under penalty of perjury that the foregoing is true and correct.

8
9 Executed this 8th day of February, 2017

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11 
12 Margaret Everett