

DECLARATION OF
SHAYDA
HEMMATI

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON and
STATE OF MINNESOTA,

Plaintiffs,

v.

CIVIL ACTION NO. 2:17-cv-00141-JLR

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; JOHN F.
KELLY, in his official capacity as
Secretary of the Department of
Homeland Security; REX W.
TILLERSON, in his official capacity
as Acting Secretary of State; and the
UNITED STATES OF AMERICA,

Defendants.

Pursuant to 28 U.S.C. § 1746(2), I, Shayda Hemmati, hereby declare as follows:

1. I have been a resident of New York since September 2015 and, I am an Iranian national.
2. I am currently a postdoctoral research fellow at the Cancer Research Center at Albert Einstein College of Medicine.
3. After finishing my PhD in Germany at the prestigious University of Heidelberg, I came to the United States to pursue my career in helping cancer patients and improving the conventional cancer therapies by performing more in-depth translational research.
4. I am permitted to work in the United States under a H1-B employment visa which is valid for one more year, until April 2018. As a result of the Executive Order, I am not sure if I will be able to renew my visa and be permitted to continue to work in the United States.
5. I conduct research specifically on leukemia at the Cancer Center Research Center.

1 6. In my research career of over 10 years, I have researched several different types of
2 cancer. I have several publications on how to improve treatments for certain types of
3 blood and ovary cancer, including identifying genes involved in cancer. I also conducted
4 clinical research, which is very useful for patients suffering from cancer. Clinical cancer
5 research is typically conducted over the course of several years to obtain sufficient data—
6 at least 2 to 3 years. I am currently researching personalized cancer treatment for
7 leukemia patients which may take years to complete.
8

9 7. The Executive Order will also affect my personal life. My entire family is in Iran,
10 including my parents and my siblings. Prior to the ban, it was very difficult to travel to
11 the United States. The process took several months, and I had to go through a number of
12 background checks. Now, it will be impossible. I am very concerned that my parents
13 cannot come and visit me. This has made me question whether it is worth staying in the
14 United States to do this research. I do not want to have to sacrifice seeing my close family
15 members.
16

17 8. I was planning to apply for permanent residency in the United States to continue my
18 research and pursue my goal of helping cancer patients. However, because of the
19 Executive Order, I will probably go to Europe and continue my research there.
20

21 I declare under penalty of perjury that the foregoing is true and correct.
22

23 Executed on this 10th day of March, 2017
24

25 /s/ Shayda Hemmati
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