

DECLARATION OF SCOTT BUELL

**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, Scott S. Buell, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.

2. I am Senior Legal Counsel at MongoDB, Inc. (“MongoDB”).

3. MongoDB provides database software that combines the best of traditional databases with the flexibility, scale and performance modern applications need. MongoDB builds the database and its drivers, offers software and services, provides MongoDB University, and sponsors the MongoDB community. MongoDB has thousands of customers across the world and its database has been downloaded more than 25 million times.

4. MongoDB was founded in 2007 and has headquarters in New York, New York and Palo Alto, California. We have more than 700 employees worldwide, across 27 offices in 13 countries.

1 5. MongoDB is organized around and driven by its core values. We are dedicated to
2 fostering a diverse workforce and an inclusive culture, and we believe having employees from
3 around the world brings out the best ideas, broadens our perspectives, and spurs innovation.

4 6. Hundreds of MongoDB's employees are citizens of countries other than the United States,
5 including many who are in the United States on a visa. These employees regularly travel
6 internationally for business and for personal reasons.

7 7. MongoDB is at its core an international company. We have customers, users and
8 employees around the world. We frequently host events in the United States and in foreign
9 countries. MongoDB also recruits internationally in order to hire and retain our talented
10 employees.
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12 8. MongoDB firmly believes that the Executive Order signed by President Trump on March
13 6, 2017, "Protecting The Nation From Foreign Terrorist Entry Into The United States," presently
14 harms and will continue to harm its ability to continue to conduct its business on this international
15 scale. The Executive Order has created uncertainty regarding our international employees'
16 immigration status and their ability to travel to and from the United States; it impedes our ability
17 to serve our customers and users around the world and to recruit internationally; and it runs
18 counter to the values at the core of our company.
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20 9. I declare under penalty of perjury that the foregoing is true and correct.
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Executed on this 11th day of March, 2017

A handwritten signature in black ink, appearing to read 'S. Buell', is written over a horizontal line.

Scott S. Buell, Esq.