

DECLARATION OF DAVID PASHMAN

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

STATE OF WASHINGTON,

Plaintiff,

v.

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; TOM SHANNON, in his official capacity as Acting Secretary of State; and the UNITED STATES OF AMERICA,

Defendants.

Declaration of David J. Pashman, Esq.

Pursuant to 28 U.S.C. § 1746, I 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 the General Counsel of Meetup, Inc. ("Meetup"). In that role, I oversee the legal team, managing all legal functions. I also lead all of Meetup's public policy efforts.

3. Meetup is on of the world's largest network of local community groups, enabling people across the country and the world to find an existing Meetup group or start a new one. Meetup changes people's lives—and the cities and towns where they live—by connecting people around the things that matter to them. There are approximately 28 million Meetup members and approximately 260,000 Meetup groups.

4. Meetup was founded in 2002 and has been based in New York City since its inception. The company currently employs about 160 people. These employees are comprised of a diverse mix of ethnicities, religions and nationalities.

5. Meetup is a mission-driven company with a strong focus on how its business impacts society. It is committed to diversity, inclusivity, and connecting people around the world with each other. Meetup's business is premised on the belief that bringing people together locally in thousands of cities across the world can improve their lives through community. Meetup seeks to make it easier for anyone to organize a Meetup group and create something important, resulting in actions that might change their own life or one of their members' lives.

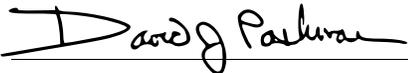
6. The recent revised Executive Order signed by President Trump on March 6, 2017, "Protecting the Nation from Foreign Terrorist Entry into the United States" (the "Executive Order") immediately and negatively impacts Meetup's employees, as well as employees' friends, families, and spouses. The Executive Order also negatively impacts candidates for employment with Meetup.

7. Meetup currently employs over 20 individuals who are not citizens of the United States. Meetup currently employs 12 individuals who are on a visa. Many of these employees have expressed fear, anxiety, and uncertainty regarding the stability of their immigration status.

8. Additionally, Meetup has serious concerns that the Executive Order will have a negative impact on its employees who are nationals of other majority Muslim nations not contained within the Executive Order, such as Bangladesh, Pakistan, or Turkey. Meetup currently employs at least 1 person who is a national of such a nation. Meetup further anticipates that the Executive Order will have a negative impact on its ability to recruit and retain highly skilled workers from both nations affected by the order and currently unaffected Muslim-majority nations, as well as Muslim individuals from other countries.

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

Executed on this 10th day of March 2017.

A handwritten signature in black ink, reading "David J. Pashman", is written over a horizontal line.

David J. Pashman, Esq.