

DECLARATION OF ROOZBEH ESKANDARI

**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, Roozbeh Eskandari, hereby declare as follows:

1. I am a resident of New York, and I have Iranian citizenship.
2. I moved from Iran to the United States in 2009 with a hope of receiving an education in a more effective academic environment. I was inspired by the United States' values of freedom of speech, and the opportunity to work closely with others regardless of their religion, ethnicity, or backgrounds.
3. In August 2009, while on a F1 student visa, I started my graduate studies at Case Western in Ohio. There, I studied chemistry and obtained a PhD degree. During these years, I had the privilege to interact with great scientists from all over the world and trained a lot of students in the chemical biology field in my capacity as instructor in the teaching lab. A

1 good proportion of my students are now at many top institutions, such as Berkeley, MIT,
2 Duke, University of California at San Diego, working towards further developing the field.

3 4. I graduated from Case Western Reserve University in July 2015. I moved to New York
4 City a month after and began to work at the Memorial Sloan Kettering Cancer Center as a
5 postdoctoral scientist focusing on developing imaging molecules with Hyperpolarize MRI
6 using the expertise that I developed for years. I currently have an Optional Practical
7 Training visa, which is an extension of my F1 visa for temporary employment.
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9 5. I have been working on developing molecules to study the aberration of metabolism in
10 different types of cancers. My current work on renal cell carcinoma is proven to be
11 translatable to humans. My colleagues and I are in the process of submitting our results to
12 cancer discovery journals, so that other physicians can utilize this technique and diagnose
13 kidney cancer at early stages.
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15 6. The issuance of the Executive Order has had a negative impact on my research. Given the
16 great uncertainty surrounding the Executive Order, it is unclear whether I will be able to
17 continue my research in the United States as my visa may not be renewed. If I cannot
18 continue my research, there is a chance that life-saving cancer treatments will remain
19 undiscovered.
20


21 7. Unfortunately, the new Executive Order will also make my personal life much harder. My
22 parents live in Iran. Because of the Executive Order, they would be unable to visit me,
23 which is emotionally burdensome.

24 8. I am also concerned that the discrimination exhibited by this Executive Order will also
25 increase the risk for hostility towards people like me.
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I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on 10th of March, 2017



Roozbeh Eskandari