

DECLARATION OF  
BRIAN  
CALLAGHAN

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

STATE OF WASHINGTON, and  
STATE OF MINNESOTA,

Plaintiffs,

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; REX W.  
TILLERSON, in his official capacity  
as Secretary of State; and the UNITED  
STATES OF AMERICA,

Defendants.

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

DECLARATION OF BRIAN  
CALLAGHAN

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

1. I am over the age of eighteen and competent to testify herein.
2. I am a Washington State resident and a United States citizen.
3. My parents-in-law live in Iran. My father-in-law is very sick, he needs a constant caregiver and someone to help him with his basic needs, like feeding him, changing his clothes, give him bath, etc. In other words, he is on bed rest. My wife's grandparents are old and my mother-in-law is their only child. For the past few years, my mother-in-law has been taking

1 care of my father-in-law and her parents. Now she is getting older and taking care of 3  
2 sick/old people is very hard on her. She is giving up. She is under lots of stress.

- 3 4. We saved money and my wife applied for green cards for her parents. The plan was to bring  
4 her dad here and have him stay with us, while her mom can travel back and forth so she can  
5 spend enough time with my wife's dad here but also stay longer in Iran to take care of her  
6 parents. Now with the new ban, we do not know what will happen. We are stuck waiting  
7 for their green cards to be processed, without knowing what delays will come next. We are  
8 worried.
- 9 5. My wife's home is Seattle. She cannot leave everything and go back, she has a life here. I  
10 was born in the United States and we do not have the option of me going with my wife to  
11 Iran for an unknown amount of time. It might not be safe for me there. And we are worried  
12 that we could get stuck in Iran for years because the travel ban could be extended  
13 indefinitely for that country.
- 14 6. My sister-in-law has stayed with my wife's parents for the past two years and helped their  
15 mom, but she is young and is ready to pursue her education. She applied to 8 universities in  
16 the United States so when we bring their dad here, she is close enough to us in case of  
17 emergencies. Some of her applications were for Master degrees and some for PhDs. She got  
18 acceptances from 7 of them. She is very talented and wants to get her PhD in urban planning.  
19 She wants to teach in a university and help the less fortunate communities.
- 20 7. Now with the new travel ban, we don't know if any of our planning is possible. How can  
21 my sister-in-law get her visa now, which she needs to continue her education? We don't  
22 know what the future is. Sometimes my wife thinks of leaving everything behind and going  
23 back to Iran to take care of her father and grandparents. She does not know what to do.
- 24 8. My wife and I are also delaying our own plans to start having children because of this  
25 situation. We are postponing getting pregnant because my wife might need to be able to  
26 travel to Iran to help her parents if her dad cannot come here. The President's second  
Executive Order leaves us with no options.

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

Executed on this 11th day of March, 2017

  
BRIAN CALLAGHAN