

# DECLARATION OF SOMAYE DADGARI

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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 SOMAYE  
DADGARI

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

1. I am over the age of eighteen and competent to testify herein.
2. I am a resident of Washington State.
3. I am lawful permanent resident of the United States with a green card.
4. My 2-year-old niece has been suffering from a rare and deadly disease called Niemann-Pick Disease Type C (NPC) since she was born. She was diagnosed with NPC about a year and half ago and since then, her mother (my sister), her dad (who is a medical doctor himself) and I have been searching for possible treatments for her. Except for very few clinical trials, there are no known cures for NPC.

- 1 5. After months of research, we found out that a clinical trial was being conducted at  
2 Oakland Children's Hospital. Since then, we have been in touch with Dr. Caroline  
3 Hastings in that hospital. She graciously helped us enroll my niece into the clinical trial.  
4 Since my sister and her family are residents of Iran, they needed to apply for a visa in  
5 order to enter the US for the clinical trial. Dr. Hastings provided them with a letter to  
6 apply for their visa. My sister and her two daughters received their visas and are have  
7 traveled to the United States for the trial.
- 8 6. My sister and my nieces' visa is set to expire on March 24th and the clinical trial is set  
9 to start on March 14th. However, for the hospital to admit my niece, they require that  
10 my sister extends the visa; otherwise they would not be able to admit her child. Even  
11 though my sister submitted her application to extend the visa a month ago, she still has  
12 not heard back from the immigration office. If the visa is not extended, my sister and  
13 my niece have no choice but to go back to Iran. Given the uncertainty regarding the  
14 changes in the US travel and immigration laws, we are not sure if they will ever get a  
15 chance to come to the US for treatment of my niece. This is devastating news for all of  
16 us since it potentially means we may lose my niece.
- 17 7. In addition, my niece's father is still in the background check process and after 7  
18 months from the interview, his visa has not been cleared yet. Taking care of a seriously  
19 ill child while being separated from her husband has been extremely hard for my sister  
20 so far.
- 21 8. We all are seriously concerned about the life of my niece as well as the well-being of  
22 the rest of the family. This is an extremely dire situation for all of us.

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

24 Executed on this 12 day of March, 2017

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SOMAYE DADGARI