

THE HONORABLE JAMES L. ROBART

**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 NOAH G.  
PURCELL IN SUPPORT OF  
EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING ORDER

Motion Noted: March 15, 2017

STATE OF OREGON,

Intervenor-Plaintiff,

v.

DONALD TRUMP, et al.,

Intervenor-Defendants.

1 Pursuant to 28 U.S.C. § 1746(2), I, Noah G. Purcell, hereby declare as follows:

2 1. I am over the age of eighteen and competent to testify.

3 2. I am the Solicitor General for the State of Washington. I make this declaration  
4 as a representative of the State of Washington (“Washington”) in support of the Emergency  
5 Motion for Temporary Restraining Order filed concurrently herewith.

6 3. Pursuant to Western District of Washington Local Rule 65(b)(1), on March 15,  
7 2017, at approximately 11:35 a.m., an attorney on my staff contacted counsel for Defendants  
8 by telephone to provide notice of Washington’s intent to file a Motion for Temporary  
9 Restraining Order by that afternoon, and to note it for same-day hearing on March 15, 2017.

10 4. Counsel for Washington spoke with Michelle Bennett and John Tyler of the  
11 U.S. Department of Justice, Civil Division, Federal Programs Branch, 20 Massachusetts  
12 Avenue, NW, Washington, D.C. 20530, (202) 305-8902.

13 5. Ms. Bennett advised that she is the point of contact for Defendants’ counsel.  
14 Ms. Bennett may be reached at (202) 305-8902 and michelle.bennett@usdoj.gov.

15 6. Ms. Bennett and Mr. Tyler advised that Defendants oppose the Motion for  
16 Temporary Restraining Order.

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

18  
19 Executed this 15th day of March, 2017

20  
21 s/ Noah G. Purcell  
22 NOAH G. PURCELL, WSBA #43492  
23 Solicitor General  
24 Office of the Attorney General  
25 800 Fifth Avenue, Suite 2000  
26 Seattle, WA 98104-3188  
(206) 464-7744

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

March 15, 2017

s/ Noah G. Purcell  
NOAH G. PURCELL, WSBA 43492

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