

Supplemental Brief Exhibit B

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**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.

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

SECOND DECLARATION OF
JEFFREY RIEDINGER

I, Jeffery Riedinger, hereby declare and affirm:

1. I have personal knowledge of the facts set forth in this declaration and I am competent to testify about them.

2. I have made further inquiries about the concerns raised by the University of Washington faculty member referenced in paragraph 7 of my prior declaration regarding the effects of the Executive Order on her professional activities and her personal situation. This

1 faculty member is someone I know personally and I have discussed her situation with her in
2 some detail.

3 3. This faculty member is a full professor and holds an endowed deanship in of one
4 of the University's Health Sciences schools. She is a dual citizen of Iran and Sweden. As a
5 young person, this faculty member fled the Islamic Revolution in Iran. She is a lawful
6 permanent resident of the United States, but not a U.S. citizen.

7 4. Although this faculty member is a lawful permanent resident, important members
8 of her immediate family are not. Her immediate family members, including her mother, mother-
9 in-law, children, and grandchildren typically visit her in the United States two to three times each
10 year. The Executive Order will prohibit such visits for the next 90 days. If the policy is
11 extended for a longer period or indefinitely, I am concerned that the faculty member may find it
12 necessary to consider leaving the University and the U.S. I believe that her departure would be a
13 very significant loss to the University.

14 5. This faculty member has been invited as the keynote speaker for an upcoming
15 conference, related to her field, in Hong Kong. It is her understanding that would-be conference
16 attendees are attending in reliance, in part, on her being the keynote speaker. Her plans to attend
17 the conference continue to be on hold because, although certain U.S. administration officials
18 have made statements that permanent residents will be "exempt" from the Order (but still subject
19 to heightened review on a "case by case" basis), it appears that the Executive Order itself has not
20 been changed, and there is still the concern that U.S. border agents may have broad discretion to
21 deny green card holders' re-entry based solely on their country of origin. The faculty member
22 has stated that she feels she cannot fulfill her University responsibilities if she cannot freely
23 travel internationally. Her concerns are not limited to the conference at which she is scheduled
24 to be the keynote speaker.

1 6. I am also aware of another current University employee from one of the seven
2 listed countries who was to attend a conference in Canada, but has decided not to travel due to
3 the issuance of the Executive Order. Conferences are an important part of the academic life of
4 any university, in that they provide an opportunity for our members of our University community
5 to network and to share and exchange information about their scholarly work with other scholars
6 in their fields.

7 7. I am confident that there are a number of other University employees from the
8 seven countries referenced in the Executive Order who, like the dean I am acquainted with, are
9 lawful permanent residents (but not citizens) of the United States and may be impacted by the
10 Executive Order.

11 8. I am also aware that University faculty have conducted active research in some of
12 the seven countries listed in the Executive Order. Although the Order does not purport to limit
13 this type of research activity directly, based on my own experience in international research, I am
14 concerned that faculty will likely encounter considerable difficulties going forward in carrying
15 out such research in countries whose citizens are categorically barred from entering the U.S. For
16 example, I am aware that several of the countries affected by the ban are in the process of
17 adopting similar bans on U.S. travelers.

18 9. As stated in my prior declaration, the University has a long tradition of hosting
19 faculty and other academic personnel from around the world. These individuals are collectively
20 referred to as “international scholars” at the University. They engage in a variety of training,
21 teaching, and research activities. These international scholars hold a University appointment and
22 require a temporary, nonimmigrant visa to enter the United States to engage in their University
23 activities.

24 10. The University’s International Scholars Operations is responsible for overseeing
25 and maintaining records pertaining to visa applications for international scholars sponsored by
26

1 the University of Washington. I have made further inquiries to that office regarding the potential
2 effects of the Executive Order on our international scholars and I have learned the following
3 updated information based upon these further inquiries:

4 a. The University currently employs nine international scholars who are from the
5 seven countries referenced in the Executive Order. These nine international scholars include
6 individuals pursuing post-doctoral training experiences and members of the faculty
7 predominantly in medicine and the STEM (Science, Technology, Engineering, and Math)
8 disciplines.

9 b. I have learned that there are at least three prospective University employees who
10 have been or will be directly affected by the Executive Order, depending on their anticipated
11 start dates at the University. The University started the process of sponsoring these prospective
12 employees months prior to their anticipated start dates (and months prior to the issuance of the
13 Executive Order.) These prospective employees include scholars in the areas of medicine and
14 engineering. Two of them had been anticipated to start in February 2017, but at this time, these
15 prospective employees have been unable to enter the U.S. to begin employment at the
16 University.

17 c. The University has also sponsored two interns who were to work with University
18 faculty members in medicine and science, but now are unable to come to the University as
19 planned for their internships due to the issuance of the Executive Order.

20 d. The University incurs costs for processing each application, including the costs of
21 the human resources required to assist the international scholars. If a person that the University
22 has sponsored cannot enter the country or carry out their work because of limitations placed by
23 Executive Order, the University loses the benefit of this investment in these individuals.
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11. The full magnitude of the Executive Order currently is unknown given that the immigration sponsorship process is a continuous effort of securing benefits such as extensions, change of status, and new applications.

12. As a result of the issuance of the Executive Order, the University has issued to the University community a "Travel Advisory on Presidential Executive Order," that advises anyone born in or holding citizenship from one of the countries referenced in the Executive Order to postpone or cancel international travel for the foreseeable future. A copy of this Advisory is attached as an exhibit to this declaration.

13. I believe that the Executive Order directly affects the University in another significant way: It deprives the University of the benefits that visiting students and scholars from the listed countries can provide. These benefits include not only the diverse perspectives that such students and scholars bring to the academic life of the institution, but also (in the case of visiting faculty and teaching and research assistants), the day-to-day work that they do in helping educate our students and advancing the University's overall academic mission. In short, I believe there is a significant cost to the University, both tangible and intangible, while the travel ban imposed by the Executive Order remains in place.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and complete to the best of my knowledge.

Dated this 24 day of February, 2017.


Jeffrey Riedinger

Exhibit to Second Declaration of Jeffrey Riedinger

“Travel Advisory on Presidential Executive Order”

Travel Advisory on Presidential Executive Order

International Scholars Operations is closely following developments surrounding the Executive Order issued on Friday, January 27th by the President and the impact it may have on our international community at the UW. The full text of this order is available on the White House website. Because implementation of this order is still ongoing, we will update this page as the application and repercussions of the order become more clear.

January 30, 2017 Update

On January 27th, a Presidential Executive Order was signed suspending nonimmigrant and immigrant entries into the U.S. by citizens of Iran, Iraq, Libya, Somalia, Sudan, Syria, and Yemen for at least the next 90 days. ISO has contacted all known academic faculty and staff with visas issued by our office and advised against any international travel at this time. While the order should not, by its language, affect citizens of other countries, or U.S. legal permanent residents from the affected countries, there are conflicting reports on these issues.

ISO is therefore advising **anyone who was born in or holds citizenship from one of the affected countries** to postpone or cancel international travel for the foreseeable future, if possible. If cancellation is not possible, persons on nonimmigrant and immigrant visas should understand that they are unlikely to be readmitted to the U.S. until the ban is lifted. For legal permanent residents, readmission is still on a "case-by-case basis" and may involve secondary inspection and additional security screening at the port of entry by Customs and Border Protection agents. If the list of affected countries or visa categories changes at a later date, or there are any other developments, ISO will update this page and follow up with affected scholars.

UW President Ana Mari Cauce has posted a statement supporting international scholars and students. The University of Washington is proud of our community of students, staff, and scholars from around the world. Both President Cauce and Provost Jerry Baldasty are "committed to providing a safe, secure, and welcoming environment that protects the privacy and human rights of all members of our community."

International scholars are an important part of this community, and ISO is committed to providing assistance and support to our international academic staff and faculty. Academic staff and faculty with concerns related to this Executive Order should feel free to contact ISO by coming in to our office during regular business hours, by e-mail to acadvisa@uw.edu, or by calling our front desk at 206-543-5630. Below are some additional resources you may find helpful.

International Student Services (resources for international students)

UW Office of Global Affairs Information and Resources

UW Counseling Services

American Immigration Lawyers Association

American Civil Liberties Union
Northwest Immigrant Rights Project
UW Safe Campus

Resources for International Scholars

[Address Update Form for J-1 Scholars](#)

[Automatic Visa Revalidation](#)

[Dependent Eligibility for Visas](#)

[E-3 Reference Guide](#)

[H-1B Reference Guide](#)

[I-94 Arrival/Departure Record](#)

[J-1 Check-In Registration Form](#)

[J-1 Reference Guide](#)

[J-1 Scholar Exit Interview](#)

[Leaving UW: Important visa and tax information](#)

[Marriage to a US Citizen](#)

[Prospective Scholars](#)

[SEVIS Printout Request](#)

[Tax Information for UW International Scholars](#)

[TN Reference Guide](#)

Travel Advisory on Presidential Executive Order

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