

Supplemental Brief Exhibit D

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

STATE OF WASHINGTON,
Plaintiff,

SECOND DECLARATION OF
ASIF CHAUDHRY

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.

I, Asif Chaudhry, hereby declare and affirm:

1. I am the Vice President for International Programs at Washington State University (WSU), Washington State’s land grant institution and the second largest public research university in the Pacific Northwest. I submit this declaration to supplement and provide additional information regarding the matters in my declaration dated January 30, 2017. I have personal knowledge of the facts set forth in this declaration, and I am competent to testify about them.

1 2. As noted in my prior declaration, WSU has 136 matriculated undergraduate and
2 graduate students from the countries targeted in the Executive Order entitled “Protecting the
3 Nation from Foreign Terrorist Entry Into the United States.” Many of these graduate students
4 also hold paid appointments as teaching or research assistants at WSU. Because of the Executive
5 Order, all of these individuals are constrained from traveling abroad for personal or academic
6 research-related reasons.

7 3. One graduate student, who holds a paid, grant-funded research assistantship with
8 WSU, works on a team that conducts atmospheric research, which is dependent on field
9 experiments and collaborations world-wide. She was scheduled to participate in experiments
10 and equipment maintenance in Greenland, which is a standard expectation of research assistants
11 in this laboratory, but is now unable to do so. This individual also was planning to attend a
12 summer institute in Canada and now likely will be unable to do so. These types of activities are
13 not only directly related to her development as a scientist but are also critical to the research
14 program as a whole. The negative impact of the Executive Order on this individual and the
15 research program is significant.

16 4. Other WSU research assistants from targeted countries have had to forego job
17 interviews in Canada for fear of being unable to return and have canceled plans to attend major
18 conferences outside the U.S., one of which is scheduled for February 5, 2017. By preventing
19 these individuals from participating in these activities, the Executive Order is having a
20 significant negative impact on their career opportunities.

21 5. There also are nine (9) active faculty members at WSU from the countries
22 targeted in the Executive Order. These individuals include instructors and researchers. Areas
23 of research conducted by these individuals include research on teaching in STEM, sustainable
24 design, using large-scale data sets for social science and educational research, molecular genetics
25 of plant disease, thermal and fluid systems, transportation systems and traffic safety, crop
26 phenotyping, and plant physiology. Many of these are areas of research that are directly related

1 to WSU's primary mission as the state's land grant institution. Because of the Executive Order,
2 all of these individuals are constrained from traveling abroad for personal or academic research-
3 related reasons.

4 6. WSU has at least one faculty member who is currently unable to return to WSU.
5 She is a research associate from an affected country who is paid from a National Science
6 Foundation Project. She traveled to Germany in January to defend her Ph.D. at another
7 university and was scheduled to return to WSU on February 11, 2017, to continue her scientific
8 research and faculty position. The Executive Order will prevent her from being able to do so,
9 and the research on this project has been put on hold until she can return.


10 7. In addition to students and faculty, WSU has two (2) visiting scholars from the
11 targeted countries who currently are unable to come to WSU. As clarification, the individual
12 mentioned in my prior declaration who was turned away in Amsterdam due to the Executive
13 Order was a student at another university but was coming to WSU as a visiting scholar to do
14 collaborative research. WSU's typical practice is to appoint visiting scholars as adjunct faculty.
15 The other visiting scholar has been in the visa application process and now has been informed
16 he likely will be unable to obtain a visa.

17 8. As noted in my prior declaration, global engagement is a critical component of
18 WSU's mission, which is "To apply knowledge through local and global engagement that will
19 improve quality of life and enhance the economy of the state, nation, and world." In addition to
20 the impact of the Executive Order on individual lives of WSU students and employees, the
21 cumulative effect of these restrictions will be to negatively impact WSU's ability to fulfill its
22 mission as the state's land grant university.

23 I declare under penalty of perjury under the laws of the State of Washington that the
24 foregoing is true and complete to the best of my knowledge.
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Dated this 1st day of February, 2017.



Asif Chaudhry, Ph.D.