

DECLARATION OF MAHDI HAJIAGHAYI

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

10 STATE OF WASHINGTON, et al.,

11 Plaintiffs,

12 v.

13 DONALD TRUMP, et al.,

14 Defendants.

CIVIL ACTION NO. 2:17-cv-00141-JLR
DECLARATION OF MAHDI
HAJIAGHAYI

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16 Pursuant to 28 U.S.C. § 1746(2), I, Mahdi Hajiaghay, hereby declare as follows:
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- 18 1. I am over the age of eighteen and competent to testify herein.
- 19 2. I live in Washington State.
- 20 3. My wife and I are Iranian scholars who work for Microsoft. I am a Data Scientist
21 and my wife is a Software Engineer at Microsoft. Data science is emerging as a new
22 impactful profession and interdisciplinary job that requires knowledge from many
23 fields including statistics, information theory, computer science and mathematics. My
24 academic background including my Ph.D and Post-doc degree as well as my four years
25 industrial experience qualify me for this job. Data science is critical to any company
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1 since it provides insight about the customers and their needs. It empowers our company
2 to grow organically and make wise and data-driven decision on producing the right
3 product. This eventually leads to create more jobs in and outside of the State.

4 According to the McKinsey & Company projecting a global excess demand of 1.5
5 million new data scientists. My wife who has a M.Sc. in computer science holds a
6 software developer position in Microsoft, where she works on Office.com website and
7 platform with more than 200M monthly active users. Her contribution for improving
8 the website has been recognized and appreciated many times by her managers. They
9 recently launched a new platform which was presented as the key innovation in Office
10 group in Microsoft. This platform provides cloud-based office solution to the customers
11 and simplify the collaboration among them. We both work on the most profitable
12 product of Microsoft, namely Office, that accounts for more than 25% of the revenue of
13 the company.
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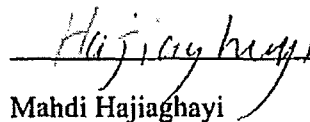
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- 16 4. Travel ban 3.0 is going to affect us in many ways. We have been living in USA long
17 enough to consider it as our second home. However, how can we really call it second
18 home when our parents or first-degree relatives can never visit us and be with us?
19 While almost all international students/scholars have this simple right as granted,
20 Iranian people have been always discriminated, and in particular, through travel ban
21 3.0. Prior to the travel ban, while we couldn't leave the country due to our single-entry
22 visa, at least our parents could apply for visa and come to see us. This small privilege is
23 going to be taken away from us. It would make us extremely happy to have our parents
24 with us. It would simply be a great motivation at work and life for us in general. We
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1 feel we have always been the victim of the animosity that has existed for many years
2 between Iran and USA. There is so many Iranians in Seattle area that they are afraid to
3 publicly complain about this policy because they are on temporary visa and the visa
4 may not be extended. We hope we can be their voice.

- 5 5. It's common to have the mom beside the daughter when she is having a baby. This is
6 crucial, especially for young couples who have no experience in taking care of a baby.
7 We are planning to extend our family and have a few children. Given the travel Ban 3.0
8 in place, it will be extremely hard for us to keep up with the work and life if we have
9 children.
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12 I declare under penalty of perjury that the foregoing is true and correct.

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14 Executed on this 10 day of October, 2017

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17 Mahdi Hajiaghayi