

DECLARATION OF  
MOJDEH JALALI  
HERAVI

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

STATE OF WASHINGTON, et al.,

*Plaintiffs,*

v.

DONALD TRUMP, et al.,

*Defendants.*

CIVIL ACTION NO. 2:17-cv-00141-JLR  
**DECLARATION OF MOJDEH  
JALALI HERAVI**

Pursuant to 28 U.S.C. § 1746(2), I, Mojdeh Jalali Heravi, hereby declare as follows:

1. I am over the age of eighteen and competent to testify herein.
2. I am a United States citizen. I am originally from Iran.
3. I currently live in Washington State and work as a Software Engineer at MemSql.
4. My parents are lecturers at California State University in LA teaching Chemistry. Although it is not easy to immigrate to another country being almost 60, after teaching and researching for more than 30 years in Iran, they immigrated to US just to be closer to all their children. My father is an American citizen.
5. My brother is a Software Engineer in Redmond WA working for Microsoft.

- 1 6. My sister is a Process Engineer in Orange, CA.
- 2 7. I still have a sister living in Sweden. She is the most talented architect that I have ever seen.
- 3 Our family's accomplishments over the past ten years have been incomplete because we
- 4 need her to be with us before we can feel whole. My father applied for her green card more
- 5 than six years ago. We were so excited in August 2017 when her DS-260 was filed and
- 6 based on her priority date her final interview for issuing the immigration visa should get
- 7 scheduled in the next 3 months.
- 8
- 9 8. However, with the President's September 24, 2017 Proclamation, my sister will never be
- 10 able to join the rest of our family, not even for a short visit. She would not be able to join us
- 11 for any of our birthdays, Thanksgiving or New Years. I do not know how I can call a place
- 12 home when I am not allowed to invite my family members to it. Although I am an American
- 13 citizen, I feel discriminated against because I am not allowed to have my family members
- 14 in my home just because of my birth country.
- 15
- 16 9. With this travel ban it is going to be almost impossible for all of us to be able to get
- 17 vacations at the same time and travel abroad just for a family gathering.
- 18

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

20 Executed on this 4th day of October, 2017

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23 Mojdeh Jalali Heravi