

DECLARATION OF  
MOHAMMAD  
SHAFIEI KHADEM

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**UNITED STATES DISTRICT COURT  
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 MOHAMMAD  
SHAFIEI KHADEM**

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16 Pursuant to 28 U.S.C. § 1746(2), I, Mohammad Shafiei Khadem, hereby declare as follows:

- 17 1. I am over the age of eighteen and competent to testify herein.
- 18 2. I live in Seattle, Washington.
- 19 3. I'm an Iranian-American dual citizen.
- 20 4. I am a Senior Software Engineer at Microsoft. Microsoft is a software/technology
- 21 company that contributes greatly to Seattle's, Washington's, and USA's economy. The
- 22 most important asset of the company is its top talent. I am a top talent. In 2013, I received
- 23 an Engineering Excellence Award, which is one of the highest achievements for
- 24 Microsoft engineering employees worldwide. The award recognizes excellence in
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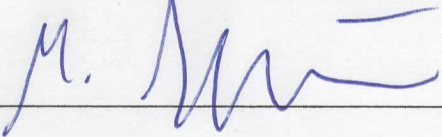
1 driving efficiency and results, optimizing business through cost or process savings,  
2 leveraging existing technologies or processes across divisional boundaries, and designing  
3 innovative and novel solutions to address engineering challenges. My work is valued at  
4 Microsoft and is important.

- 5
- 6 5. However, I am greatly impacted by the newest travel ban. Due to the recent proclamation  
7 issued on 9/24/17, my parents and brother will not be able to get a visa to visit me  
8 anymore after 10/18/17. While due to compulsory 2-year military service required by the  
9 Iranian government for all male Iranian citizens, I cannot travel to Iran freely either  
10 because I do not agree with serving in the Iranian military. This puts a great burden on  
11 myself and my family and breaks my heart since we cannot visit each other in person  
12 anymore. I might be getting married in the next few years and it is very important for me  
13 to have my family with me. In addition, for the longer term, I am hoping to bring them  
14 as immigrants to live closer to me so that I can take care of them as they get older.
- 15
- 16 6. If the newest travel ban goes forward, then I must consider moving somewhere that my  
17 family can visit or live with me if they choose to. I have studied in Canada and I am  
18 seriously considering moving to Canada as an alternative option. Moving to Europe is  
19 another alternative that I am considering.

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

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22 Executed on this 7 day of October, 2017

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26 Mohammad Shafiei Khadem