

DECLARATION OF
BANAFSHEH
SAMAREH
ABOLHASANI

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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 BANAFSHEH
SAMAREH ABOLHASANI

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16 Pursuant to 28 U.S.C. § 1746(2), I, Banafsheh Samareh Abolhasani, 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. I am originally from Tehran, Iran.
 - 20 3. I am on an F1 student visa status and moved to the USA in 2011 to start my Master's
21 degree. I am now a PhD student at the Department of Industrial and Systems
22 Engineering at the University of Washington (UW). I joined UW in 2015 by receiving
23 Graduate School Fund for Excellence Top Scholar Award given to only one PhD
24 applicant per department annually. I have been actively studying and doing research in
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1 healthcare with proven background and contributions in this field. I am currently
2 working with University of Washington Medical Center (UWMC) on projects related
3 to surgical site infection and Alzheimer disease. Where, I am working on mathematical
4 modeling and data analytics. I have published papers in this filed in accredited journals
5 such as Biomedical Informatics. I am now working with Bioinformatics group at
6 UWMC to submit a grant on the issue of depression analysis via social signal
7 processing techniques. Hence, I believe I have made many contributions in the field of
8 healthcare.
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- 10 4. My mother is a single mom living in Iran. She was planning to visit me early 2018 for
11 the celebration of Persian new year and has an appointment with the US council in
12 Ankara Turkey on October 23rd 2017. I haven't seen her for three years and this is a
13 really difficult time for my family being so far apart. With the new travel ban going
14 into effect, we are now confused about whether she should travel to Turkey to attend
15 her visa appointment or not as the consulate has not declared any cancelation
16 yet. Meanwhile, I am concerned that she would not have her visa by October 18, 2017
17 regardless if she goes to her appointment.
18
- 19 5. I have a single entry F1 visa, hence it is not possible for me to leave the country and
20 visiting her soon. Given, the situation for receiving student visa and lengthy
21 background checking and my responsibilities here as a graduate researcher and my
22 commitment to my folks back in UWMC I would not be able to leave the country. I
23 have a graduate research appointee where I have to work 20hr/week to satisfy the offer.
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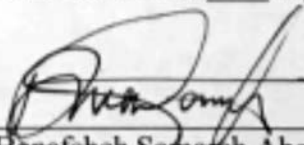
1 Also, working in healthcare, and the urgency of my need to complete my task would
2 not allow me leaving the country.

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4 6. I haven't met my mom for about three years. She is a single mom and emotionally very
5 much attached to me and my brother (Postdoc fellow at University of British
6 Columbia, Vancouver Canada). I even cannot meet my brother being just few miles
7 away from me (he is living in Vancouver). This is a very devastating time time for my
8 entire family. An educated family who have many proven contributions in the field of
9 healthcare.

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11 7. I have tried to apply for Summer internship. Many of the tech companies have rejected
12 me given that I am from Iran. The reason is because of the uncertainty of the visa
13 problems and their concern about my future stay in the country. My end goal is to
14 become a faculty make more contributions in the field of data analytics. This is a very
15 stressful time in my life. I am soon going to be in the job market for faculty position.
16 And, yet not sure if I can stay here.

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

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20 Executed on this 5 day of October, 2017

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23 Banafsheh Samareh Abolhasani