

THIRD
DECLARATION OF
ROVY BRANON

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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

Third Declaration of Rovy Branon

Pursuant to 28 U.S.C. § 1746(2), I, Rovy Branon, hereby declare as follows:

1. I am over the age of 18 and am competent to testify.
2. I am the Vice Provost for the Continuum College, a self-sustaining unit of the University of Washington (UW). Continuum College operates a broad range of fee-based programs for the UW, including a large International English Language Program (IELP) that attracts students from around the world.
3. I am aware of the September 24, 2017, Presidential Proclamation entitled “Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry into the United

1 States by Terrorists or other Public-Safety Threats,” (“Proclamation”), which imposes certain
2 restrictions on the entry of nonimmigrants and immigrants who are nationals of eight countries
3 – Chad, Iran, North Korea, Libya, Somalia, Syria, Venezuela, and Yemen. The issuance of this
4 Proclamation follows the January 27, 2017 Presidential Executive Order entitled “Protecting the
5 Nation from Foreign Terrorist Entry Into the United States” (“First Order”), which imposed a
6 90-day ban on the entry into the U.S. by persons from the countries of Syria, Iran, Sudan,
7 Somalia, Iraq, Libya, and Yemen, and the March 6, 2017 Presidential Executive Order
8 modifying the First Order (“Second Order”).

9 4. Continuum College’s IELP has historically enrolled students from several of the
10 countries listed in the most recent Proclamation. Currently IELP has two enrolled students from
11 countries on that list. Since the issuance of the First Order, Continuum College has experienced
12 an overall decline in international applications for the IELP. For Autumn Quarter (which is our
13 busiest quarter) in 2016, we received 250 applications from new students, while for Autumn
14 Quarter 2017, we received 196 applications, which is a 21.6% drop.

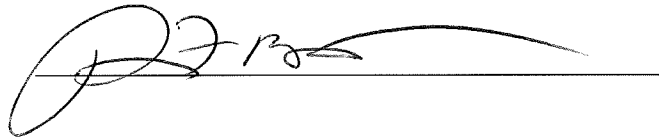
15 5. With regard to the number of students from the countries listed in the
16 Proclamation, in Autumn 2016 and Winter 2017 (for which applications would have been
17 submitted prior to the issuance of the First Order in January 2017), we received 6 applications
18 from students in those countries, with four of the six actually enrolling. In the three quarters
19 since (Spring 2017, Summer 2017 and Autumn 2017), we have received a total of five
20 applications, with only one student actually enrolling. (The other currently enrolled student from
21 a country on the list is attending through the University’s Visiting International Student
22 Internship and Training (VISIT) program rather than as a direct IELP enrollee.)

23 6. Continuum College cannot know how many prospective students for its programs
24 have chosen not to apply since the issuance of the First Order and it cannot say that the issuance
25 of the prior Executive Orders is the sole reason it has experienced a decline in applications to
26 the IELP, but I believe it is probable that some portion of this decline can be attributed to a

1 perception that the U.S. is no longer a welcoming place to study for non-U.S. students, especially
2 from majority Muslim countries. I am aware of a number of students from countries on the most
3 recent list who have been accepted into our program but have indicated that they have been
4 unable to obtain visas (and have therefore deferred enrolment.) One such student sent us an e-
5 mail in June of this year indicating that he is “no longer interested in studying in USA.”

6
7 7. A majority of students who enroll in IELP for a particular quarter continue to
8 participate in the program for subsequent quarters. Accordingly, I believe that it is probable that
9 some of the students referenced above would have enrolled for multiple quarters if they had been
10 able to come here to begin classes in our program.

11
12 Executed on this 10 day of October, 2017

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14  A handwritten signature in black ink, appearing to be 'D. J. ...', is written over a horizontal line.