

# DECLARATION OF SHIMA NOFALLAH

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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 SHIMA  
NOFALLAH**

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

1. I am over the age of eighteen and competent to testify herein.
2. I live in Washington State and am a PhD student at the University of Washington.
3. I am originally from Iran.
4. I came to the United States last year, 2016, with my husband on an F2 visa. I had a strong resume and applied for the PhD program in Electrical Engineering at the University of Washington and got admitted. I applied for a status change from F2 to

1 F1 inside the US and now I have a valid F1 status which means I don't have a visa  
2 anymore, but a valid status to study in the US.

3 5. My research is focused on diagnosis of Melanoma stages using Computer Vision and  
4 Machine Learning techniques. The incident of Melanoma is rising so fast and ~1 in 50  
5 U.S adults will be diagnosed with this disease each year. There is a high diagnosis error  
6 in interpreting skin biopsies of melanocytic lesion; pathologists disagree in up to 60%  
7 of cases of invasive melanoma, which can lead to substantial patient harm. That's why  
8 using machine learning techniques to train a computer and using the pattern to teach  
9 pathologists is very important matter nowadays.

10 6. My husband is a second year PhD student in Marketing at University of Washington.  
11 His research is focused on quantitative analysis of customer behavior data to propose  
12 strategies in order to have a better marketing methods and increase company's profit.  
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14 7. My parents do not currently have visas to come to the United States. With this new  
15 travel ban, my parents cannot ever visit me. I lost my only sibling to Leukemia a few  
16 years ago. My parents suffered a lot during that time. The possibility of not being able  
17 to visit me for years is like they are losing another child. We are heartbroken.  
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19 8. My PhD program length is about 5 years. Neither I nor my parents can bear this  
20 situation for that long. If they cannot come here to visit me, both my husband and I will  
21 have to quit our program and go back to Iran. It is like wasting all of our years of hard  
22 work.  
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1 I declare under penalty of perjury that the foregoing is true and correct.  
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4 Executed on this \_\_ 5\_\_ day of October 2017

5 *Shima Nofallah*

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7 Shima Nofallah  
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