

# DECLARATION OF KHADIJEH SHEIKHAN

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

STATE OF WASHINGTON; STATE  
OF CALIFORNIA; STATE OF  
MARYLAND; COMMONWEALTH  
OF MASSACHUSETTS; STATE OF  
NEW YORK; and STATE OF  
OREGON,

CIVIL ACTION NO. 2:17-cv-00141-JLR

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity as  
Acting Secretary of the Department of  
Homeland Security; REX  
TILLERSON, in his official capacity  
as Secretary of State; and the UNITED  
STATES OF AMERICA,

Defendants.

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

1. I am a resident of New York, and I have Iranian citizenship.
2. I am a third-year computer science PhD student at New York University and am scheduled to graduate in 2021.
3. I specialize in Computational Geometry. My research helps large companies in the technology industry, such as Google. I completed an internship at Google this past summer.

- 1 4. I had a multiple entry visa that expired in August 2017. Although I have a student visa,  
2 I am afraid that if the Proclamation issued on September 24, 2017, remains in effect, I  
3 will be unable to return to the United States to complete my education if I depart.
- 4 5. The issuance of the travel ban Executive Orders has had a negative impact on my  
5 studies as well as on my personal life. For instance, the Executive Orders have limited  
6 my ability to travel for academic reasons. I need to be able to travel internationally in  
7 order to complete my research in the narrow field of computational geometry.
- 8 6. Prior to the travel ban announced in the Proclamation, I planned on traveling to  
9 Brussels in January 2018 to attend a research group spearheaded by my advisor, who  
10 recently moved there. I have placed these plans on hold due to concern that I will not be  
11 allowed to return to the United States once I leave. As a result, I will miss obtaining  
12 critical feedback on my research from my advisor, as well as opportunities to  
13 collaborate with other researchers in my field.
- 14 7. The travel ban Executive Orders have also limited my ability to travel for personal  
15 reasons. My mother, father, and five siblings live in Iran. Because of the travel ban  
16 announced in September 2017, I am not sure when I will see my family again. My  
17 husband, who is also a citizen of Iran, is a computer science PhD student at Stony  
18 Brook University. His father passed away so he frequently has to visit his mother in  
19 Iran, who now lives alone. The travel ban impacting Iranian nationals prevents my  
20 husband from going to Iran to visit his mother. If my husband cannot visit his mother,  
21 we both may have to quit our PhD programs and return to Iran.  
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