## DECLARATION OF KHADIJEH SHEIKHAN

1		The Honorable James L. Robart	
2	UNITED STATES DISTRICT COURT		
3	WESTERN DISTRICT OF WASHINGTON		
4	STATE OF WASHINGTON; STATE OF CALIFORNIA; STATE OF		
5	MARYLAND; COMMONWEALTH OF MASSACHUSETTS; STATE OF		
6	NEW YORK; and STATE OF OREGON,	CIVIL ACTION NO. 2:17-cv-00141-JLR	
7	Plaintiffs,		
8			
9	V.		
10	DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF		
11	HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity as		
12	Acting Secretary of the Department of Homeland Security; REX		
13	TILLERSON, in his official capacity		
14	as Secretary of State; and the UNITED STATES OF AMERICA,		
15	Defendants.		
16	Pursuant to 28 U.S.C. § 1746(2), I, Khadijeh Sheikhan, hereby declare as follows:		
17	1. I am a resident of New York, and I have Iranian citizenship.		
18	2. I am a third-year computer science PhD student at New York University and am		
19	scheduled to graduate in 2021.		
20	3. I specialize in Computational Geometry. My research helps large companies in the		
21	technology industry, such as Google. I completed an internship at Google this past		
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23	summer.		
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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
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8		order to complete my research in the narrow field of computational geometry.
9	6.	Prior to the travel ban announced in the Proclamation, I planned on traveling to
10		Brussels in January 2018 to attend a research group spearheaded by my advisor, who
11		recently moved there. I have placed these plans on hold due to concern that I will not be
12		allowed to return to the United States once I leave. As a result, I will miss obtaining
13 14		critical feedback on my research from my advisor, as well as opportunities to
14		collaborate with other researchers in my field.
16	7.	The travel ban Executive Orders have also limited my ability to travel for personal
17		reasons. My mother, father, and five siblings live in Iran. Because of the travel ban
18		announced in September 2017, I am not sure when I will see my family again. My
19		husband, who is also a citizen of Iran, is a computer science PhD student at Stony
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21		Brook University. His father passed away so he frequently has to visit his mother in
22		Iran, who now lives alone. The travel ban impacting Iranian nationals prevents my
23		husband from going to Iran to visit his mother. If my husband cannot visit his mother,
24		we both may have to quit our PhD programs and return to Iran.
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1	8. Moreover, the travel ban Executive Orders have limited my opportunities for post-	
2	graduation employment. Even though remaining in the United States post-graduation	
3	would increase my opportunities for employment, the Executive Orders have caused me	
4	to reconsider whether staying in the United States would be the best choice for me.	
5	Because of these Orders, I remain uncertain about when I will be able to see my family	,
6 7	again and whether I will be able to travel as required to further my education. This has	,
8	placed a substantial emotional burden on me and my family.	
9	r and s s s s s	
10	I declare under penalty of periury that to the best of my knowledge, the foregoing is true	
11	I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true	
12	and correct.	
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14	Executed on this <u>11th</u> day of October, 2017	
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16	Khadijeh Sheikhan	
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