

DECLARATION OF
SAHAR Z
ZANGENAH

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**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 SAHAR Z
ZANGENAH**

Pursuant to 28 U.S.C. § 1746(2), I, Sahar Z Zangenah, hereby declare as follows:

1. I am over the age of eighteen and competent to testify herein.
2. I live in Washington State.
3. I am faculty at Fred Hutchinson Research Center in Seattle, WA. I am a faculty statistician at the HIV Prevention network of the Vaccine and Infectious Disease division of Fred Hutch. My research focuses on developing statistical methodology with substantive focus on design and analysis of HIV prevention trials. I work both on domestic (U.S) trials as well as international trials. In addition to research, I also

1 occasionally teach a graduate course (Sample Survey Techniques) at the University of
2 Washington.

3 4. I am a dual US/Iranian citizen who has many family members still in Iran. I am fortunate
4 to be a U.S. citizen and have the luxury to be able to travel to Iran and visit our family.
5 However, due to my busy work schedule, I am unable to spend quality time with each
6 family member (most of our trips span less than two weeks).

7
8 5. My husband is [my husband is also a dual US/Iranian citizen. He is a faculty at University
9 of Washington School of Public Health. In addition to research, he also teaches to a broad
10 audience at UW and mentors/advises graduate students.

11 6. We were planning to invite my 73 year old aunt to visit us for my 40th birthday which is
12 coming up on March 22, 2018. My aunt is scheduled to have open-heart surgery in
13 October (she is scheduled to be admitted to the hospital on October 11th 2017) and this
14 trip is planned to profoundly help her recovery. She first visited the U.S in 1978, when
15 she came to help my parents with their first-born child (myself). I was born after her first
16 open-heart surgery. My husband and I thought inviting her for my 40th birthday would
17 be a great way to show our appreciation. Of course, it also meant a great deal for us to
18 have her celebrate with us along with our other family.

19
20
21 7. If the President's September 24, 2017 Proclamation is implemented, none of these plans
22 would be possible. More importantly, I would not be able to play any role in helping my
23 aunt recover from her upcoming surgery; I remember spending many summers at her
24 place in Tehran, and I was looking forward for an opportunity to give back for all she has
25 done for me, by helping her get through her latest health battle.
26

1 8. With two young children (two daughters ages 4.5 and 2.5), our family still has many
2 milestones ahead of us. This travel ban would impair my right to invite anyone in my
3 extended family to come and visit, whether it be for celebrating accomplishments and
4 major life events or seeking their help during times of transitions or hardships.
5

6 I declare under penalty of perjury that the foregoing is true and correct.
7

8 Executed on this __9th__ day of October, 2017
9

10 
11

12 _____

13 Sahar Z Zangenah
14
15
16
17
18
19
20
21
22
23
24
25
26