

THE HONORABLE JAMES L. ROBERT

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**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,

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.

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

NOTICE OF LODGING
ADDITIONAL DECLARATIONS

On October 11, 2017, the States of Washington, California, Maryland, New York, Oregon, and the Commonwealth of Massachusetts (“States”) filed a proposed Third Amended Complaint for Declaratory and Injunctive Relief. ECF 194-1 (filed as ordered by the Court at ECF 198). Concurrent with filing the proposed Third Amended Complaint, the States moved to enjoin implementation of portions of the most recent immigration ban (“EO3”), ECF 195, and submitted

1 more than 50 declarations evidencing the harms that EO3 would cause to the States' residents,
2 educational institutions, economies, businesses, and health care systems. ECF 194-3 (index of
3 declarations); ECF 194-18 to 194-69 (declarations). The States continue to establish evidence of
4 the harms that EO3 will cause if it is implemented. Accordingly, the States provide this Notice of
5 Lodging Additional Declarations, an updated index, and additional declarations as follows:

- 6 1. Declaration of Negin Ingbriksen, Washington State Resident (Oct. 8, 2017).
7 ECF 202-2.
 - 8 2. Second Declaration of Sadaf Amin, Iranian PhD Student at Weill Cornell Medicine-
9 Medical College of Cornell University (Oct. 11, 2017). ECF 202-3.
 - 10 3. Declaration of Janet Billups, Of Counsel and Policy Advisor to the President of the
11 Oregon Health and Sciences University (Oct. 12, 2017). ECF 202-4.
 - 12 4. Declaration of Janet Camp, International Student Services Coordinator at Eastern
13 Oregon University (Oct. 16, 2017). ECF 202-5.
 - 14 5. Declaration of Susan Capalbo, Senior Vice Provost and Interim Senior International
15 Officer (Oct. 11, 2017). ECF 202-6.
 - 16 6. Second Declaration of Margaret Everett, Interim Provost and Vice President for
17 Academic Affairs at Portland State University (Oct. 12, 2017). ECF 202-7.
 - 18 7. Declaration of Anke Schennink, President for United Automobile, Aerospace and
19 Agricultural Implement Workers of America, Local 5810 (Oct. 10, 2017).
20 ECF 202-8.
 - 21 8. Second Declaration of Lovely A. Warren, Mayor for the City of Rochester
22 (Oct. 12, 2017). ECF 202-9.
 - 23 9. Declaration of Wim Wiewel, President of Lewis & Clark College (Oct. 12, 2017).
24 ECF 202-10.
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- 1 10. Declaration of Lydia Wood, Recording Secretary for United Automobile, Aerospace
2 and Agricultural Implement Workers of America, Local 4123 (Oct. 10, 2017).
3 ECF 202-11.
- 4 11. Declaration of Joseph E. Fahey, Corporation Counsel for the City of Syracuse
5 (Oct. 12, 2017). ECF 202-12.
- 6 12. Declaration of Aaron Levine, City Attorney for the City of Ithaca, New York
7 (Oct. 11, 2017). ECF 202-13.
- 8 13. Second Declaration of Eric Scherzer, Executive Director of Interns and Residents/
9 SEIU Healthcare (addressing New York impact) (Oct. 13, 2017). ECF 202-14.
- 10 14. Third Declaration of Eric Scherzer, Executive Director of Interns and Residents/
11 SEIU Healthcare (addressing California impact) (Oct. 17, 2017). ECF 202-15.

12 DATED this 19th day of October, 2017.

13 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

October 19, 2017

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