

DECLARATION OF LYDIA WOOD

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; 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; JOHN F.
KELLY, in his official capacity as
Secretary of the Department of
Homeland Security; REX W.
TILLERSON, in his official capacity
as Secretary of State; and the UNITED
STATES OF AMERICA,

Defendants.

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

**DECLARATION OF LYDIA
WOOD**

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

1. I am over the age of eighteen and competent to testify herein.
2. I am the Recording Secretary of United Automobile, Aerospace and Agricultural Implement Workers of America, Local 4123, which represents Academic Student Employees—tutors, readers, and teaching assistants—across the California State University (“CSU”) system. I work closely with many foreign-born Academic Student Employees, who are members of Local 4123, and have been involved in the Union’s support and advocacy for international Academic Student Employees on the CSU campuses.
3. A large number of UAW 4123 members are international. Some are nationals or citizens of one of the eight countries (Chad, Iran, Libya, North Korea, Somalia, Syria, Venezuela, and Yemen) named in the Executive Order issued on September 24, 2017 by President Donald J. Trump, entitled “Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats” (September 24 Order). These members are in the U.S. on valid visas.
4. UAW 4123 members will be adversely affected by the September 24 order because the order suspends the entry of immigrants and non-immigrants based on national origin indefinitely.
5. Since the September 24 order was signed, Academic Student Employees have expressed to UAW 4123 concerns about its impacts on their work and studies at and for CSU, their careers beyond the University, and their families. Academic Student Employees, who are citizens or nationals of one of the eight countries named in the September 24 order, whose visas are single-entry, risk being unable to obtain a new valid visa to return to the U.S. should they travel outside the country. The September 24 order also impairs the ability of close family members of Academic Student Employees to come to the U.S. and visit with UAW 4123 members, making continued work at CSU more difficult. In addition, many Academic Student Employees identify as Muslim and experience additional fear of participating in normal educational, social and community activities on account of their religion.

6. UAW 4123 is aware of at least one Academic Student Employee who is a citizen or national of one of the eight countries named in the September 24 order and is a single entry visa holders. One Academic Student Employee has plans to travel outside of the U.S. to attend an academic conference; inability to travel to the conference may impact the studies, work, and future career of this member. UAW Local 4123 is aware of at least one member, who is an Iranian national, and a graduate student, as well as a Teaching Assistant, who altered her travel plans because of the ban and her University's advice that all international students not travel. As a result of the Executive Order, she is living in an uncertain and stressful situation. UAW 4123 is aware of other members who are unable to visit close family members or friends outside of the U.S. or are significantly concerned that family who are nationals of the eight countries would not be able to obtain visas to visit them in the U.S. UAW 4123 is aware of other members who seek future employment in the U.S. but whose job prospects are now limited and ability to secure future work tenuous because of employers' fears that the Academic Student Employee will not be permitted to remain in the country.

7. On February 27, 2017, UAW 2865, along with other UAW local unions representing scholars and academic workers, made the following statement, signed by thousands of UAW members:

We call on our Federal and State representatives to reject any attempts to ban or limit opportunities for international students and scholars to work in the United States. Instead, we must preserve and expand important programs—including Optional Practical Training, J-1, H-1B, and the permanent residency process—that foster the inclusion of people who come to share their talent, ideas, and expertise from across the globe.

Innovation, discovery, and research do not stop at national borders. Neither can the rights and opportunities of students and scholars who make major contributions to world-class research and teaching at U.S. universities. Their work before and after graduation plays an essential role in driving leadership in innovation technology and scholarship, breakthrough cures to our most threatening diseases, and efforts to address urgent issues like climate change.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 10th day of October, 2017

Lydia Wood

A handwritten signature in cursive script that reads "Lydia P. Wood". The signature is written in dark ink and is positioned directly below the printed name "Lydia Wood".