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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

7 STATE OF WASHINGTON, et al., Case No. C17-0141JLR
8 Plaintiffs, DECLARATION OF DAVID G. ELLIS
9
10 v.
11 DONALD J. TRUMP, et al.,
12 Defendants.

13

14 I, David G. Ellis, hereby declare and affirm as follows:

15 1. I have personal knowledge of the facts set forth in this declaration and I am
16 competent to testify about them.

17 2. I am the Interim President of Lewis & Clark College. I work at Lewis & Clark's
18 campus in Portland, Oregon.

19 3. Lewis & Clark College is a private institution comprised of three schools, the
20 College of Arts and Sciences, the Graduate School of Education and Counseling, and the Law
21 School.

22 4. Lewis & Clark College is a liberal arts institution committed to diversity and
23 inclusion. Its student body includes approximately 200 international students from six continents
24 and more than 70 countries. The presence of international students enriches the lives and
25 education of everyone at Lewis & Clark.

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1 - DECLARATION OF DAVID G. ELLIS

OREGON DEPARTMENT OF JUSTICE
100 SW Market Street
Portland, OR 97201
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SP3/rh2/8034178-v1

1 5. Lewis & Clark College has at least one student from countries subject to the
2 immigration ban imposed by President Trump's Executive Order of January 27, 2017 whose
3 lives and studies are disrupted (the "Executive Order"). The Executive Order interferes with
4 student ability to travel as part of their participation in an overseas study program or to return to
5 their home country with the expectation that they will be allowed to return to their studies at
6 Lewis & Clark.

7 6. Because of the immigration ban, a student cannot participate in planned overseas
8 study program with the expectation of being allowed back into the United States to continue their
9 studies at the Lewis & Clark. Due to the Executive Order, the student is now restricted from
10 participating in this important experience.

11 7. By interfering with the ability of affected students to travel and to reenter the
12 United States on student visas, the Executive Order disrupts the operation of the Lewis & Clark's
13 programs and services and damages its ability to foster diversity and inclusive, full, and free
14 participation in student life.

15 8. The Executive Order harms Lewis & Clark's ability to attract and retain students
16 from nations whose citizens are subject to the immigration ban to become part of the Lewis &
17 Clark community. It is my opinion that the Executive Order will have a chilling effect on Lewis
18 and Clark's efforts to recruit international students, causing fiscal harm through the loss of
19 tuition from students who are unable or unwilling to attend Lewis & Clark and harming our
20 longstanding efforts to foster a diverse and global student body.

21 **I declare under penalty of perjury that the foregoing is true and correct.**

22 EXECUTED on February 9, 2017.



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DAVID G. ELLIS