

DOUGLAS S. CHIN (Bar No. 6465)
Attorney General of the State of Hawai‘i
CLYDE J. WADSWORTH (Bar No. 8495)
Solicitor General of the State of Hawai‘i
DEIRDRE MARIE-IHA (Bar No. 7923)
DEPARTMENT OF THE ATTORNEY
GENERAL, STATE OF HAWAI‘I
425 Queen Street
Honolulu, HI 96813
Telephone: (808) 586-1500
Fax: (808) 586-1239
Email: deirdre.marie-iha@hawaii.gov

NEAL K. KATYAL*
HOGAN LOVELLS US LLP
555 Thirteenth Street NW
Washington, DC 20004
Telephone: (202) 637-5600
Fax: (202) 637-5910
Email:
neal.katyal@hoganlovells.com

**Admitted Pro Hac Vice*

Attorneys for Plaintiff, State of Hawai‘i
(See Next Page For Additional Counsel)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI‘I

STATE OF HAWAI‘I,

Plaintiff,

v.

DONALD J. 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 Homeland Security;
REX TILLERSON, in his official capacity as
Secretary of State; and the UNITED STATES
OF AMERICA,

Defendants.

Civil Action No.
1:17-CV-00050-DKW-KJM

**DECLARATION OF CLYDE
J. WADSWORTH
REGARDING EXHIBIT C TO
DECLARATION OF
DOUGLAS S. CHIN IN
SUPPORT OF PLAINTIFF’S
MOTION FOR TEMPORARY
RESTRAINING ORDER**

ADDITIONAL COUNSEL

KIMBERLY T. GUIDRY (Bar No. 7813)
DONNA H. KALAMA (Bar No. 6051)
ROBERT T. NAKATSUJI (Bar No. 6743)
Deputy Attorneys General
DEPARTMENT OF THE ATTORNEY
GENERAL, STATE OF HAWAI'I
425 Queen Street
Honolulu, HI 96813
Telephone: (808) 586-1500
Fax: (808) 586-1239

COLLEEN ROH SINZDAK*
MITCHELL P. REICH*
ELIZABETH HAGERTY**
HOGAN LOVELLS US LLP
555 Thirteenth Street NW
Washington, DC 20004
Telephone: (202) 637-5600
Fax: (202) 637-5910

THOMAS P. SCHMIDT*
HOGAN LOVELLS US LLP
875 Third Avenue
New York, NY 10022
Telephone: (212) 918-3000
Fax: (212) 918-3100

SARA SOLOW*
ALEXANDER B. BOWERMAN*
HOGAN LOVELLS US LLP
1835 Market St., 29th Floor
Philadelphia, PA 19103
Telephone: (267) 675-4600
Fax: (267) 675-4601

**Pro Hac Vice Applications
Forthcoming*

*** Admitted Pro Hac Vice*

Attorneys for Plaintiff, State of Hawai'i

**DECLARATION OF CLYDE J. WADSWORTH REGARDING EXHIBIT C
TO DECLARATION OF DOUGLAS S. CHIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER**

I, CLYDE J. WADSWORTH, hereby state and declare as follows:

1. I am the Solicitor General for the State of Hawai'i and an attorney of record representing Plaintiff in this case. Unless otherwise stated, I have personal knowledge of and am competent to testify to the truth of the matters stated in this Declaration.

2. On February 3, 2017, Plaintiff filed the following documents, among others, in this case: (1) *Declaration of Douglas S. Chin in Support of Plaintiff's Motion for Temporary Restraining Order* (the "Chin Declaration") (Dkt. No. 10); (2) *Ex Parte Motion for In Camera Review of Exhibits A, B, and C to Declaration of Douglas S. Chin in Support of Plaintiff's Motion for Temporary Restraining Order* (the "Ex Parte Motion") (Dkt. No. 15); and (3) *Declaration of Clyde J. Wadsworth in Support of Ex Parte Motion for In Camera Review of Exhibits A, B, and C to Declaration of Douglas S. Chin in Support of Plaintiff's Motion for Temporary Restraining Order* (the "Wadsworth Declaration") (Dkt. No. 15-1).

3. Exhibits A, B, and C to the Chin Declaration were submitted to this Court for *in camera* review for the reasons stated in the *Ex Parte* Motion and the Wadsworth Declaration.

4. The declarant for Exhibit C (“Declarant C”), as well as his family, was described in the *Ex Parte* Motion at Page 6 and the Wadsworth Declaration at Paragraph 6.

5. Hours after Plaintiff filed its Complaint and Motion for Temporary Restraining Order in this action, the United States District Court for the Western District of Washington issued a temporary restraining order barring enforcement nationwide of provisions of the Executive Order at issue in this action.

6. On February 7, 2017, Declarant C informed my office that, due to the TRO that has been imposed on the Executive Order, his family members were able to return, and have now returned, to the United States.

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

DATED: Honolulu, Hawaii, February 8, 2017.

/s/ Clyde J. Wadsworth
Clyde J. Wadsworth