

Honorable James L. Robart

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

Case No.: 2:17-cv-00135-JLR

Juweiya Abdiaziz ALI; A.F.A., a minor;
Reema Khaled DAHMAN; G.E., a minor;
Jaffer Akhlaq HUSSAIN; Seyedehfatemeh
HAMEDANI; Olad Issa OMAR; Faduma
Olad ISSA; F.O.I., a minor; and S.O.I., a
minor; on behalf of themselves as individuals
and on behalf of others similarly situated,

Plaintiffs,

v.

Donald TRUMP, President of the United States
of America; Jefferson B. SESSIONS, Attorney
General of the United States; U.S.
DEPARTMENT OF STATE; Rex W.
TILLERSON, Secretary of State; U.S.
DEPARTMENT OF HOMELAND
SECURITY; John F. KELLY, Secretary of
Homeland Security; U.S. CITIZENSHIP AND
IMMIGRATION SERVICES; Lori
SCIALABBA, Acting Director of USCIS;
CUSTOMS AND BORDER PROTECTION;
Kevin K. McALEENAN, Acting
Commissioner of CBP; OFFICE OF THE
DIRECTOR OF NATIONAL
INTELLIGENCE; Michael DEMPSEY,
Acting Director of National Intelligence,

Defendants.

**SECOND DECLARATION OF MATT
ADAMS IN SUPPORT OF PLAINTIFFS’
EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

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2 I, Matt Adams, declare as follows:

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4 1) I am counsel of record for Plaintiffs in this case. I submit this declaration in
5 support of Plaintiffs' Emergency Motion for a Temporary Restraining Order and a Preliminary
6 Injunction.

7 2) I have personal knowledge of the facts set forth herein, and, if called as a witness,
8 I could and would testify completely as set forth below.

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10 **Notice to Defendants of Motion for Preliminary and Possible Emergency Relief**

11 3) On March 7, 2017, counsel for the parties conducted a telephonic status
12 conference pursuant to FRCP 26(f). On that telephone call, I advised Defendants' counsel,
13 Stacey I. Young, that Plaintiffs would file an emergency motion for a temporary restraining order
14 and an amended complaint no later than Friday, March 10, 2017. I further advised Ms. Young
15 that Plaintiffs would request a hearing on the emergency motion for a temporary restraining
16 order for either Tuesday, March 14, 2017 or Wednesday, March 15, 2017. Ms. Young did not
17 object to those dates.

18
19 **Evidence in Support of Plaintiffs' Motion**

20 4) Attached as Exhibit A is a true and correct redacted copy of an email sent by
21 donotreply@usvisa-info.com on March 7, 2017 to Shahrzad Shahri, an immigrant visa applicant
22 scheduled for a visa interview on March 21, 2017. Ms. Shahri forwarded the email to my
23 colleague Mozhdeh Oskouian, the Directing Attorney of the Seattle office of the Northwest
24 Immigrant Rights Project on March 7, 2017.

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27 I declare under penalty of perjury of the laws of the state of Washington and the United
28 States that the foregoing is true and correct to the best of my knowledge and belief.

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Executed in Seattle, WA on the 10th day of March, 2017.

By:

s/Matt Adams

Matt Adams

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record for all Defendants. With respect to new Defendants U.S. Customs and Border Protection and the Attorney General, current counsel for Defendants, Stacy Young, has advised that she will not accept service for the agency. Therefore, along with a copy of the amended complaint and second motion for class certification, I arranged for *personal delivery* of these documents and corresponding proposed orders to:

United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, WA 98101-1271

as well as the mailing of these documents by *U.S. certified mail* to:

U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

and

U.S. Customs and Border Protection
Office of the Chief Counsel
1300 Pennsylvania Avenue, N.W.
Washington, DC 20229

Executed in Seattle, Washington, on March 10, 2017.

s/ Matt Adams

Matt Adams, WSBA No. 28287
Northwest Immigrant Rights Project
615 Second Avenue, Suite 400
Seattle, WA 98104
(206) 957-8611
(206) 587-4025 (fax)

EXHIBIT A



Glenda Aldana Madrid <glenda@nwirp.org>

Fwd: FW: Important U.S Executive Order Information

Mozhdeh Oskouian <mozhdeh@nwirp.org>
To: Malou Chávez <malou@nwirp.org>, Glenda Aldana Madrid <glenda@nwirp.org>

Fri, Mar 10, 2017 at 3:56 AM

----- Forwarded message -----

From: **shahrzad shahri** [REDACTED] >
Date: Tue, Mar 7, 2017 at 10:20 AM
Subject: Fwd: Important U.S Executive Order Information
To: Mozhdeh Oskouian <mozhdeh@nwirp.org>

----- Forwarded message -----

From: "The Visa Information Service" <donotreply@usvisa-info.com>
Date: 7 Mar 2017 21:45
Subject: Important U.S Executive Order Information
To: <[REDACTED]>
Cc:

Dear Applicant,

A U.S. Executive Order signed on March 6 affects visa applicants who are nationals of Iran, Libya, Somalia, Sudan, Syria and Yemen. If you are a national of one of these countries, please review the information at this link <https://travel.state.gov/content/travel/en/news/important-announcement.html> before paying an MRV fee, scheduling an interview appointment, or attending your interview.

If you have questions, you may send an email to coves+nbr@visaops.net; however, we are unable provide case specific guidance so please monitor travel.state.gov for further updates.

Best regards,

The CSRA Visa Appointment and Information Service Team

This message was sent to [REDACTED] from:
The Visa Information Service | donotreply@usvisa-info.com | CSC | 15000 conference center | chantilly, va 20151

Manage Your Subscription:
<http://app.icontact.com/icp/mmail-mprofile.pl?r=74841821&l=123937&s=XPHI&m=947309&c=349536>