

Honorable James L. Robart

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
27
28

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

Juweiya Abdiaziz ALI, et al.,

Plaintiffs,

v.

Donald TRUMP, et al.,

Defendants.

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

**DECLARATION OF MOZHDEH
OSKOUIAN
IN SUPPORT OF PLAINTIFFS**

I, Mozhdeh Oskouian, declare under penalty of perjury as follows:

1. I am over the age of eighteen, am competent to testify to the matters below, and make this declaration based on personal knowledge.

2. I am an attorney at the Northwest Immigrant Rights Project in Seattle, Washington. Our office represents Mr. Gholamreza Shahri, an 84-year-old United States citizen, in conjunction with his family visa petition for his daughter, Ms. Shahrzad Shahri, an Iranian citizen.

3. Mr. Shahri has been recently diagnosed with various age-related illnesses and has had to rely on Shahrzad Shahri, his youngest daughter, for care. For this reason, Mr. Shahri has had to reside in Iran for longer periods than what he intended or preferred.

4. Mr. Shahri filed a family visa petition for his daughter on July 17, 2009 and paid the required filing fee. The family visa petition was approved on October 25, 2011.

1 5. In March 2016, Ms. Shahri's priority date became current, meaning she could finally
2 begin the consular process to actually obtain an immigrant visa. Mr. Shahri and his three
3 children—two of whom are also United States citizens—were very glad when Ms. Shahri's visa
4 number became current and she began consular processing.

5 6. On December 28, 2016, Ms. Shahri received notice that she had been scheduled for an
6 immigrant visa interview in Abu Dhabi, United Arab Emirates, on February 12, 2017. Ms.
7 Shahri purchased a plane ticket, reserved a hotel room, and incurred other necessary expenses in
8 preparation for her interview.

9 7. On January 28, 2017, Ms. Shahri received notice that due to the Executive Order issued
10 on January 27, 2017 her interview appointment had been cancelled. She was told that she would
11 be contacted when the National Visa Center was able to reschedule her immigrant visa interview.
12 On February 8, 2017, Ms. Shahri emailed the National Visa Center asking for clarification on the
13 process in light of the injunction against the Executive Order issued by the United States District
14 Court.
15

16 8. On February 10, 2017, Ms. Shahri received an updated notice from the National Visa
17 Center, informing her that United States embassies and consulates overseas have resumed
18 interviewing immigrant visa applicants. Ms. Shahri was rescheduled for an Immigrant Visa
19 interview on March 21, 2017.

20 9. Ms. Shahri again purchased a plane ticket, reserved hotel accommodations, scheduled her
21 medical examination, and made all other necessary arrangements to attend her interview. This
22 time, the expense of Ms. Shahri's travel arrangements were even more substantial as none of the
23 expenses were refunded due to proximity of her interview date to the Iranian New Year.

24 10. On March 6, 2017, the Administration issued a new Executive Order, again banning
25 citizens of Iran and five other countries from travel to the United States. This ban is to go into
26 effect on March 16, 2017, five days prior to Ms. Shahri's interview.
27
28

1 11. On March 7, 2017, Ms. Shahri received an email notice informing her of the March 6,
2 2017 executive order. It was unclear whether her March 21, 2017 interview would be cancelled.
3 Ms. Shahri is unable to recover the expenses she incurred in making the travel arrangements.
4 She intends to travel to Abu Dhabi to at least complete her medical examination, while she
5 awaits the scheduling of a *third* immigrant visa interview.
6

7 12. Mr. Shahri and Ms. Shahri are both worried over the future costs they will have to incur,
8 especially considering the unstable exchange rate between Iran’s rial and U.S. dollar. All of Mr.
9 Shahri’s children are worried about Mr. Shahri’s health and the uncertainty regarding when they
10 will be able to finally be reunited in light of the Administration’s chaotic immigration policies.
11

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct to the best of my information, knowledge, and belief.
14

15 Executed on this 9th day of March, 2017, in Seattle, Washington.
16

17 *s/ Mozhdeh Oskouian*

18 Mozhdeh Oskouian
19 Attorney
20 Northwest Immigrant Rights Project
21 615 Second Avenue, Suite 400
22 Seattle, Washington 98104
23 (206) 957-8623
24
25
26
27
28