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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON, sand STATE OF MINNESOTA,

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 ANKE SCHENNINK

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

1. I am over the age of eighteen and competent to testify herein.
2. I am President of United Automobile, Aerospace and Agricultural Implement Workers of America, Local 5810, which represents Postdoctoral Scholars at the University of California ("UC"). I work closely with many foreign-born Postdoctoral Scholar members of Local 5810 and have been involved in the Union's support and advocacy for international Postdoctoral Scholars on the UC campuses.

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3. Approximately two-thirds of UAW 5810 members are international scholars. Many are nationals or citizens of one of the six countries (Iran, Libya, Somalia, Sudan, Syria, and Yemen) named in the Executive Order issued on March 6, 2017 by Donald J. Trump, entitled “Protecting the Nation from Foreign Terrorist Entry Into the United States” (March 6 Order). These members are in the U.S. on valid visas.
4. UAW 5810 members have been adversely affected by the March 6 order because Section 2(c) “direct[s] that the entry into the United States of nationals of those six countries be suspended for 90 days from the effective date of this order, subject to the limitations, waivers, and exceptions set forth in sections 3 and 12 of this order.”
5. Since the March 6 order was signed, Postdoctoral Scholars have expressed to UAW 5810 concerns about its impacts on their work at and for UC, their careers beyond the University, and their families. Postdoctoral Scholars who are citizens or nationals of one of the six countries named in the March 6 order risk being unable to obtain a new valid visa to return to the U.S. should they travel outside the country. Section 2(c) of the March order also impairs the ability of close family members of Postdoctoral Scholars to come to the U.S. and visit with UAW 5810 members, making continued work at UC more difficult. In addition, many Postdoctoral Scholars identify as Muslim and experience additional fear of participating in normal educational, social and community activities on account of their religion.
6. UAW 5810 is aware of many members whose close relatives have been unable to make planned visits or who have been unable to visit their families. The March 6 order has interfered with the ability of many of our members to have normal, important family visits. For instance:
 - One scholar from Iran is expecting a baby with her husband. Her parents were scheduled to come visit, but their visa appointments at the Dubai

1 embassy were cancelled; they will be unable to meet their newborn
2 grandchild.

- 3 • The parents of another scholar from Iran had plans to visit him and to meet
4 their 9-month old grandson. They have cancelled their trip until the situation
5 with the ban is clarified.
- 6 • The parents of another Postdoctoral Scholar from Iran had plans to visit their
7 daughter in the United States for the first time in over five years; they have
8 been forced to cancel their visa application.
- 9 • A Postdoctoral Scholar from Iran and her husband are considering having a
10 second child, but as her parents would not be able to visit and help care for
11 their new grandchild, they are reconsidering.
- 12 • Several Postdoctoral Scholars have delayed planned trips to Iran indefinitely
13 over fears of not being able to re-enter. One of these scholars informs us that
14 the psychological burden of feeling as though his status is uncertain, and his
15 inability to see his family, has taken a toll on his capacity to concentrate on
16 work without distraction, a complaint voiced by a number of Postdoctoral
17 Scholars. He and his wife had been planning to buy a house in California; now
18 they are unsure of their plans because they feel unwelcome in the United
19 States.
- 20 • Another Postdoctoral Scholar, who has studied and worked in the U.S. for
21 seven years and gained a nationwide reputation as a researcher, had planned to
22 travel to Iran to get married in May 2017. After the Executive Order was
23 issued, his future spouse's visa interview on May 24 was cancelled by the U.S.
24 embassy in Dubai, which has forced them to postpone the wedding. He was
25 shocked and confused, and is reconsidering whether to stay in the U.S. to raise
26 a family and continue his career.

27 7. UAW 5810 is aware of other members who seek future employment in the U.S.
28 but whose job prospects are now limited and their ability to secure future work

1 tenuous because of employers' fears that the Postdoctoral Scholar will not be
2 permitted to remain in the country. For instance:

- 3 • One Postdoctoral Scholar works at a prestigious national laboratory, and he
4 has worked in the U.S. and paid taxes as a non-resident alien for five years.
5 The uncertainty of his future employment has caused irreparable stress and
6 frustration. He reports that he suffers from chronic stress due to uncertainty of
7 the future of his family and because he now feels unwelcome in this country.
8 Even a single day of the ban creates more anxiety and frustration for this
9 scholar.
- 10 • I am aware of another individual from Iran who has a job offer from a major
11 technology corporation headquartered in California. He has applied for an F-1
12 Optional Practical Training visa, but his application has been delayed for
13 unknown reasons. As a result of the executive orders, he feels frustration and
14 worries that his future employer will experience financial loss due to
15 employment delays. He has expressed his view that the executive order is a
16 disgrace to him.

17 8. On February 27, 2017, UAW 5810, along with other UAW local unions
18 representing scholars and academic workers, made the following statement,
19 signed by thousands of UAW members:

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

26 Innovation, discovery, and research do not stop at national borders.
27 Neither can the rights and opportunities of students and scholars who
28 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.

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

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Executed on this 30 day of March, 2017

Berkeley, California



ANKE SCHENNINK