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12
 13 UNITED STATES DISTRICT COURT
 14
 15 NORTHERN DISTRICT OF CALIFORNIA

16 CITY AND COUNTY OF SAN FRANCISCO
 and COUNTY OF SANTA CLARA,

Case No. 4:19-cv-4717-PJH

17 Plaintiffs,

**CITY AND COUNTY OF SAN FRANCISCO
 AND COUNTY OF SANTA CLARA'S
 RECORD CITATION OF EVIDENCE OF
 HARMS**

18 vs.

19 U.S. CITIZENSHIP AND IMMIGRATION
 20 SERVICES; DEPARTMENT OF
 HOMELAND SECURITY; KEVIN
 21 McALEENEN, Acting Secretary of Homeland
 Security; and KENNETH T. CUCCINELLI, in
 22 his official capacity as Acting Director of U.S.
 Citizenship and Immigration Services,

23 Defendants.

1 The City and County of San Francisco and the County of Santa Clara submit these Record
2 Citations of Evidence of Harms in response to the Court's October 2, 2019 Minute Entry:

3 **1. Loss of Federal Medicaid Funds.**

4 ECF Doc. 29, Wagner Decl. ¶¶ 4-6.

5 ECF Doc. 42, Shing Decl. ¶ 28-32.

6 **2. Increased Out of Pocket Expenditures.**

7 ECF Doc. 31, Paule Decl. ¶¶ 4-6.

8 ECF Doc. 32, Hammer Decl. ¶¶ 4-5.

9 ECF Doc. 33, Ehrlich Decl. ¶¶ 5-7.

10 ECF Doc. 34, Sung Decl. ¶¶ 4-6.

11 ECF Doc. 40, Lorenz Decl. ¶¶ 14-16.

12 ECF Doc. 29, Wagner Decl. ¶¶ 7-8.

13 ECF Doc. 45, Márquez Decl. ¶ 9.

14 **3. Increased Administrative and Operational Costs.**

15 ECF Doc. 24, Pon Decl. ¶¶ 13-16.

16 ECF Doc. 25, Rhorer Decl. ¶¶ 10-11.

17 ECF Doc. 26, Smith Decl. ¶¶ 4-9.

18 ECF Doc. 40, Lorenz Decl. ¶ 19.

19 ECF Doc. 42, Shing Decl. ¶¶ 10-12.

20 ECF Doc. 43, Cody Decl. ¶ 13-14.

21 ECF Doc. 45, Márquez Decl. ¶¶ 9-10.

22 **4. Public Health Harms.**

23 ECF Doc. 30, Aragon Decl. ¶¶ 7-16.

24 ECF Doc. 43, Cody Decl. ¶¶ 6-8, 13-14.

25 **5. Economic Harms to the Counties.**

26 ECF Doc. 27, Weisberg Decl. ¶¶ 10-11.

27 ECF Doc. 42, Shing Decl. ¶ 13-14, 25.

28 ECF Doc. No. 44-10, RJN Exhibit J.

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Dated: October 4, 2019

Respectfully submitted,

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