

**Declaration of Blake Doe**

I, Blake Doe, upon my personal knowledge, hereby declare as follows:

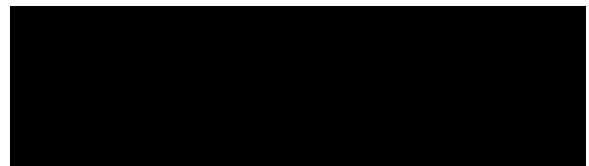
1. I am a United States citizen. I was born in Portland, Oregon.
2. I currently live in Corvallis, Oregon, with my wife, where I am a college senior at Oregon State University studying civil engineering.
3. I have lived my whole life in Oregon. I grew up with my mother and father in Tualatin and the Portland area. I lived with them up until I went to college. I plan to begin my job search after graduation.
4. My parents are really amazing people, and I aspire to hold and share the values of compassion, hard work, and responsibility that they have instilled in me. My father, [REDACTED], and my mother, [REDACTED], currently reside in Oregon. They are citizens of Mexico. Because of their sacrifices, I will be the first person in my family to graduate from college. I anticipate graduating in June 2020.
5. I have health insurance through my university, and I also have dental insurance through my wife who works full time. I intend to apply for insurance through the Oregon Health Plan after I graduate. I cannot enroll in my wife's employer plan because it is prohibitively expensive for me.
6. I am seeking to permanently unify my family together here in Oregon because this is where I am from. I love my parents. We are a strong and proud family, and I want to be together with them. I filed petitions for my parents in order to regularize their status.
7. I applied for my parents to come to the United States on or around April 27, 2017. The I-130 petitions were approved on or around January 17, 2018. On June 11, 2019, the USCIS determined that my members of my family would suffer an extreme hardship if visas were denied to my parents and, therefore, approved an extreme hardship waiver in order to enable my parents to complete the immigration process.

8. Since then, my parents have submitted all the necessary documents and information to proceed with the immigrant visa process and are awaiting the scheduling of the interview at the American Consulate in Ciudad Juarez, Mexico.
9. They were awaiting the interview when they received news of the October 4 Presidential Proclamation detailing the ban on their entry unless they will be covered by approved health insurance within 30 days of their entry into the United States, or unless they possesses the financial resources to pay for reasonably foreseeable medical costs.
10. My parents' sacrifices have not come without cost—both to them and to me. My mother's health has declined recently. She has rheumatoid arthritis and Lupus Erythematosus – both painful conditions. She receives treatment that she pays for out of pocket. The treatments are necessary to enable her to live without pain. She has tried to get insurance; though, she has been told she is ineligible because of her immigration status. My father has repeatedly tried to obtain insurance for her. His employer does not offer a health insurance plan.
11. Currently, my parents do not have health insurance. I have spoken with my dad about health insurance for both of them, particularly for my mom. Based on my research on the internet, I think it would be very expensive to get meaningful insurance for her.
12. As a full-time student in college, I have no income and cannot afford health insurance for my parents. I also have around \$20,000 worth of student loan debt. Therefore, my parents would be affected by the Proclamation.
13. I understand that under the new Proclamation, the process I began for them will be indefinitely stopped. I understand that my parents will not be able to complete the immigration process, they will continue to live in fear, and I will continue to live in fear every day of permanent separation. This fear has very real tangible impacts on me and my parents such as causing constant worry and feelings of depression.
14. My family is from Mexico. I believe that the purpose of the Proclamation is meant to prevent people like me and my family from emigrating to the United States and reuniting with family. The President's statements and views behind

the immigration restrictions make me feel targeted for my national origin and has caused me and my family considerable anxiety and stress.

15. I am fearful that my participation in this lawsuit against United States federal government officials could jeopardize the visa petition for my family. I do not want my participation in the lawsuit to adversely impact the petition and delay or prevent my parents from coming to the United States.
16. I fear that whether or not my parents' visa petition is delayed or denied, my participation in the lawsuit using my real name would subject my family to harassment/violence/discrimination in the United States. For standing up for the injustices that is being done here, we become vulnerable to actions from people that agree with this Proclamation, and we want to protect ourselves from that.
17. For these reasons, I feel that my personal security and that of my family necessitates that I be allowed to proceed under a pseudonym.
18. I am willing to serve as a class representative on behalf of those who are similarly situated to me and cannot have family members join them in the United States because of the current refugee restrictions.
19. I know that if the class is certified I will be representing more than just myself in this case. I have spoken with the lawyers who represent me about what being a class representative means. I want to help everyone in my situation because we are all suffering due to the unfair restrictions on refugee admissions imposed by this Administration.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at Corvallis, OR on October 29, 2019.

A large black rectangular redaction box covering the signature area.

✓ "Blake Doe"