

**Declaration of "Jane Doe"**

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

1. I am a United States citizen who was born in Los Angeles, California, in 1965.
2. I currently live in Los Angeles, California.
3. I am unable to work due to disability. Due to my disability, I have health insurance through Medi-Cal.
4. I have sponsored an immigrant visa application for my husband so that we can finally live together in the same country.
5. My husband is a German citizen who currently lives in Berlin, Germany. Trained as an architect, my husband teaches architectural theory. Although he is not currently working, he expects to teach another course beginning in February.
6. I first met my husband when he was in Los Angeles for a prestigious artist-in-residence program in 2006. After he returned to Germany, we had an off and on relationship until 2012. After we reconnected again a few years ago, we knew we wanted to be married. My husband and I were married in Los Angeles in February of 2018.
7. My husband and I decided that we would live together in the United States rather than Germany. My desire to stay in the Los Angeles area is very strong. I am very close to my immediate family. I live on the same property as my brother, his wife, and their two children, and the rest of my immediate family lives nearby. My grandmother, who is a Holocaust survivor, is still living, and I enjoy living nearby her.
8. I applied for my husband to come to the United States in July 2018. USCIS approved my Form I-130 family-based petition in April 2019.
9. Since then, my husband and I have been working to gather the documents required for consular processing. Several times, we thought we had all of the paperwork submitted, but the government then requests additional, different information from us.
10. Although I knew the immigration process would be difficult and require patience, I have been very discouraged by the October 4 Presidential Proclamation. I don't

feel very hopeful because, although we are self-sufficient, I do not believe we will be able to meet the new requirements of the Presidential Proclamation.

11. I do not know how we would be able to prove at a consular interview that my husband would be covered by approved health insurance within 30 days of his entry into the United States. I know that he cannot be added to my Medi-Cal health insurance. Even if he were able to obtain health insurance through an employer in the United States, I do not see how we could prove that at a consular interview. My husband speaks English and German fluently, so his employment prospects in Los Angeles are good, but it is hard to have a plan for employment when we don't know when he will arrive. How can he apply for a job in the United States when he does not know when he will enter? At the time of the consular interview, his entry date will be at an unknown date in the future. How can he possibly prove that he will be insured within 30 days of entry when he does not even know when he will enter?
12. Neither my husband nor I have the financial resources to afford health insurance, in the short-term at least, for my husband or to pay his foreseeable medical expenses out of pocket. My husband has multiple sclerosis, and his treatments are expensive.
13. My husband currently has German health insurance coverage that covers the cost of his treatments. Through investigation, we have learned that [he will be unable to receive that coverage if he emigrates to the US]. When my husband has visited the United States, he has purchased traveler's insurance. [It is our understanding that he is not eligible for that insurance if he is moving to the United States, not just visiting.]
14. I have already been living apart from my husband for almost two years. Being married and living in different countries has been miserable. Living apart is really hard. Although we talk often, we rarely get to see one another, and we have to incur travel expenses when one of us visits the other. I have had to go into debt to see my husband.
15. Having my husband living with me in the United States would be helpful in every possible way. My disability makes it difficult for me to keep up with household

tasks, and having my husband's help would make my life much better. For example, although I can wash dishes and clean my house, I cannot keep up with these chores on my own due to my disability. My husband would also contribute to our household financially. He has already started looking at job postings in Los Angeles, and he is eager to begin working. Moreover, because we would be living near my family, my husband and family would be able to get to know each other better. Mostly, though, I am looking forward to living together in the United States because we are in love. Being together would make me so happy.

16. My husband and I started this process more than a year ago, and I feel like the Presidential Proclamation is an unexpected and absurd change in the rules. I think the Presidential Proclamation means that unless you are rich, you cannot come into this country.
17. I am a very private person. I am not at all comfortable being contacted by the media. I am concerned that my participation in the lawsuit using my real name would subject me to unwanted attention.
18. My husband does not want people to know that he has multiple sclerosis. He would like to protect the privacy of his personal health information.
19. For the sake of my privacy and the privacy of my husband, I ask that I be allowed to proceed under a pseudonym.
20. 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 Presidential Proclamation.
21. 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 Presidential Proclamation.



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



*J*  
"Jane Doe"