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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JOHN DOE #1; JUAN RAMON MORALES;
JANE DOE #2; JANE DOE #3; IRIS
ANGELINA CASTRO; BLAKE DOE;
BRENDA VILLARRUEL; and LATINO
NETWORK,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States; U.S.
DEPARTMENT OF HOMELAND
SECURITY; KEVIN MCALEENAN, in his
official capacity as Acting Secretary of the
Department of Homeland Security; U.S.
DEPARTMENT OF HEALTH AND
HUMAN SERVICES; ALEX M. AZAR II, in
his official capacity as Secretary of the
Department of Health and Human Services;
U.S. DEPARTMENT OF STATE;
MICHAEL POMPEO, in his official capacity
as Secretary of State; and UNITED STATES
OF AMERICA,

Defendants.

Case No.: 3:19-cv-01743-SB

**DECLARATION OF JANE DOE #2 IN
SUPPORT OF PLAINTIFFS' MOTION
FOR A PRELIMINARY INJUNCTION**

Declaration of "Jane Doe #2"

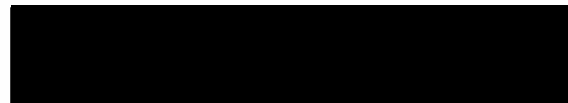
I, "Jane Doe", upon my personal knowledge, hereby declare as follows:

1. I am a United States citizen who was admitted to the United States as an LPR in 2014 and who naturalized in 2018.
2. I currently live in Rancho Cucamonga, California with my two children. I work as a packager at a nail plate company. In the United States I have my brothers and sisters here. Life in the United States has not been easy and I have had many obstacles along the road. I have been in this country for 13 years and I have seen the beauty and opportunities this country has for people. As a victim of abuse, I am thankful to this country for giving me the chance to get up on my two feet and continue with my life after that dark time. The United States has given me a sense of hope and happiness for the future and although I am not where I would like to be, I am getting there.
3. I currently have MediCal health insurance, through California's state Medicaid program, due to my low income. It has been hard financially as a single mother to be able to afford a private health insurance.
4. I have sponsored an immigrant visa application for my parents, so that I can reunite with them here.
5. My parents are [REDACTED] and currently reside in Nicaragua. They are nationals of Nicaragua.
6. I applied for my parents to come to the United States on or around December 19, 2018. The I-130 petitions were approved on or around July 09, 2019.
7. Since then, my parents have received the NVC letter to proceed with the Consular Process and we are currently working on the collection of information and documents to submit the DS-260 and immigrant documents.
8. 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 the alien's entry into the United States, or unless the alien possesses the financial resources to pay for reasonably foreseeable medical costs.

9. Currently my parents do not have health insurance. They go to local clinics in Nicaragua when they need medical assistance. After being victim of abuse and being a single mother, it has been financially hard for me. I will need a joint sponsor in order to complete the affidavit of support section of my parents' immigrant visa.
10. I have looked at what is considered approved health insurance under the President's Proclamation and the plans are either not available to my parents or are unaffordable due to my family's current financial situation. For example, Medicare is not available to my parents and none of our family members can add our parents onto an approved plan.
11. I have already been living apart from my parents for 13 years, and the separation has been difficult to say the least. I can only communicate with my parents twice a week, if that, since they live in a remote location. The separation has been extremely hard. To be away for many years from my parents made me feel alone in this country. To have gone through the domestic violence and not have my mother and father here to run to and ask for help. To have endured so many horrible moments but also beautiful ones like the birth of my children and they could not be a part of that, breaks my heart. Not only has a daughter been separated from her parents, but grandkids have not had the opportunity to meet their grandparents.
12. It has been many milestones that my parents have missed in their grandkids' life and my children have missed the opportunity to experience what it is to have a loving, caring, nurturing grandparent in their life. It is sad to realize that they do not know the meaning of a grandparent. My parents are the only grandparents involved in my kids' life, not having them physically here is extremely hard. They have missed birthdays, Christmas, New Years, and every single achievement personally and in school. Although we try to always keep them involved, it is not easy keeping communication when we are so far away. These are moments that they will never get back and many firsts that are long gone. I just pray that my kids are able to meet their grandparents soon and be able to make up all the lost time and moments.

13. I understand that under the new Proclamation I am indefinitely unable to reunite with my parents. When I learned that our separation will be prolonged indefinitely, I felt saddened. To have gone through many awful moments and then having hope to finally reunite with your parents is a feeling that cannot be explained. All those hopes were crushed by the uncertainty of how much longer it would take with the Proclamation.
14. 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.
15. 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 imposed by this Proclamation.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at Encino, CA on November 5, 2019.

A solid black rectangular box used to redact the signature of the declarant.

“Jane Doe”