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Attorneys for Plaintiffs

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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-SI

**DECLARATION OF NADIA DAHAB IN
SUPPORT OF PLAINTIFFS' REPLY TO
MOTION FOR CLASS CERTIFICATION**

I, Nadia Dahab, upon my personal knowledge, submit this declaration pursuant to 28 U.S.C. § 1746:

1. I am a Senior Staff Attorney at Innovation Law Lab and counsel for Plaintiffs in the above-captioned matter. I have personal knowledge of the following facts and, if called to testify, I could and would competently do so.

2. On November 1, 2019, I filed, on behalf of Plaintiffs Blake Doe, John Doe #1, Jane Doe #2, and Jane Doe #3 (“the Doe Plaintiffs”), a Motion to Proceed Under Pseudonym. ECF 15. The next day, this Court granted the motion, ECF 31, but told the parties during the hearing on Plaintiffs’ Motion for Temporary Restraining Order that Defendants were free to seek reconsideration of the Court’s order.

3. Almost a week later, on Friday afternoon, November 8, I received an e-mail from Defendants’ counsel referring to the Court’s order on Plaintiffs’ Motion to Proceed Under Pseudonym and requesting the names and any A-numbers of the Doe Plaintiffs. On Monday, November 11, I responded to that e-mail, asking Defendants’ counsel to articulate the purposes for which they intended to use the information they had requested.

4. On Wednesday, November 13, Defendants’ counsel explained to me via e-mail that they had requested the Doe Plaintiffs’ names and A-numbers so that they could “test” each Doe Plaintiffs’ factual allegations and “defend against” Plaintiffs’ Motion for Preliminary Injunction. The same day, I responded, asking Defendants’ counsel whether they would be willing to agree to exchange the requested information pursuant to a Stipulated Protective Order with an attorneys-eyes-only designation. The next day, Defendants’ counsel declined, explaining that they would be willing to agree to a Stipulated Protective Order but could not agree to limit the information to attorneys’ eyes only.

5. On Monday, November 18, 2019, I sent Defendants' counsel a draft proposed Stipulated Protective Order. The next day, on Tuesday, November 19, 2019, after our litigation team had conferred with each of the Doe Plaintiffs, I provided Defendants' counsel with the full name and location of each of the Doe Plaintiffs. At that time, Defendants had not asked for any information pertaining to any non-Doe Plaintiff.

6. On the afternoon of November 18, 2019, I received an e-mail from Defendants' counsel requesting, with respect to all Plaintiffs, "the full name of each petitioner and the beneficiary," "any USCIS petition receipt numbers," and "any Department of State case numbers."

7. On November 21, 2019, after our litigation team had conferred as necessary with all of the Plaintiffs, I provided Defendants with the full names of each petitioner and beneficiary, all of the Form I-130 or Form I-601/601A approval dates of which I was aware, and all of the USCIS petition receipt numbers and/or State Department case numbers of which I was aware. On November 25, 2019, I sent a follow-up e-mail to Defendants' counsel and provided additional information I had received that morning relating to one of the named Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 27th day of November, 2019.

/s/ Nadia Dahab
Attorney, Innovation Law Lab