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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' MOTION  
TO COMPEL COMPLETION OF  
ADMINISTRATIVE RECORD AND  
PRIVILEGE LOG**

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. Attached as **Exhibit A** to this declaration is a true and correct copy of the privilege log that I received via e-mail from Defendants pursuant to this Court's Order Setting Amended Case Management Schedule, ECF 117.

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

EXECUTED on this 24th day of January, 2020.

/s/ Nadia Dahab  
Attorney, Innovation Law Lab

**Doc. et al. v. Trump, et al. (Case No. 3:19-cv-01743-SB)**

**Privilege and Redactions Log**

Administrative Record Page	Document Description	Email Subject Line or Document Title	Document Date	Privilege or Redaction Description
000011	Bureau of Consular Affairs Press Guidance on Presidential Proclamation 9945	VISAS: Presidential Proclamation on Suspension of Entry of Immigrants Who Will Financially Burden the United States Healthcare System	10/4/2019	Redacts names of Department officials below the Deputy Assistant Secretary (DAS) level .
000016	Bureau of Consular Affairs Talking Points for Congressional Call on Presidential Proclamation 9945	VISAS: Presidential Proclamation on Suspension of Entry of Immigrants Who Will Financially Burden the United States Healthcare System	10/4/2019	Redacts names of Department officials below the Deputy Assistant Secretary (DAS) level .
000021	Action Memo for the Secretary of State seeking approval of standards and procedures for implementing Presidential Proclamation 9945	Action Memo for the Secretary: Standards and Procedures for Presidential Proclamation 9945	Approved on 10/28/2019	Redacts names of Department officials below the Deputy Assistant Secretary (DAS) level .
000025-28	Cable to all diplomatic and consular posts (ALDAC) on Presidential Proclamation 9945	19 STATE 115030	10/30/2019	(1) Law Enforcement Privilege - Contains law-enforcement-sensitive information regarding interagency screening and vetting and evaluation of visa eligibility which could risk circumvention of the proper application of the INA; (2) Redacts names of Department of State officials below the Deputy Assistant Secretary (DAS) level..
000037	Foreign Affairs Manual (FAM) guidance (which was approved, but has not gone into effect due to the temporary restraining order and preliminary injunction)	9 FAM 302.14-11 (U) PRESIDENTIAL PROCLAMATION 9945	Approved on 10/28/2019	Law Enforcement Privilege - Contains law-enforcement-sensitive information regarding interagency screening and vetting and evaluation of visa eligibility which could risk circumvention of the proper application of the INA.
000068	VO email message to posts on PP 9945 (October 7, 2019)	Message to Posts: Health Insurance Proclamation	10/7/2019	Redacts names of Department officials below the Deputy Assistant Secretary (DAS) level .
000069	VO email message to posts on PP 9945 (November 1, 2019)	MESSAGE TO POSTS: PP 9945 Suspension of Entry of Immigrants Who Will Financially Burden the United States	11/1/2019	Redacts names of Department officials below the Deputy Assistant Secretary (DAS) level .
000070-100, 000112	Bureau of Consular Affairs training presentation ("webinar") for consular officers on Presidential Proclamation 9945 and the Department's Interim Final Rule on Public Charge	Presidential Proclamation 9945 and INA212(a)(4)(A) - Public Charge	10/24/2019	(1) Law Enforcement Privilege - Contains law-enforcement-sensitive information regarding interagency screening and vetting and evaluation of visa eligibility which could risk circumvention of the proper application of the INA; (2) Redacts names of Department of State officials below the Deputy Assistant Secretary (DAS) level.
000101-111	Bureau of Consular Affairs training presentation ("webinar") for consular officers on Presidential Proclamation 9945 and the Department's Interim Final Rule on Public Charge	Presidential Proclamation 9945 and INA212(a)(4)(A) - Public Charge	10/24/2019	Contains non-responsive content on the Department's interim final rule on public charge
000114-118	Transcript of questions and answers from Bureau of Consular Affairs first training presentation ("webinar") for consular officers on Presidential Proclamation 9945 and the Department's Interim Final Rule on Public Charge	Rough transcript of question and answer components of first webinar on PP 9945	10/24/2019	(1) Law Enforcement Privilege - Contains law-enforcement-sensitive information regarding interagency screening and vetting and evaluation of visa eligibility which could risk circumvention of the proper application of the INA; (2) Contains non-responsive content on the Department's interim final rule on public charge; and (3) Redacts names of Department of State officials below the Deputy Assistant Secretary (DAS) level.
000119-120	Transcript of questions and answers from Bureau of Consular Affairs second training presentation ("webinar") for consular officers on Presidential Proclamation 9945 and the Department's Interim Final Rule on Public Charge	Rough transcript of question and answer components of second webinar on PP 9945	10/24/2019	(1) Law Enforcement Privilege - Contains law-enforcement-sensitive information regarding interagency screening and vetting and evaluation of visa eligibility which could risk circumvention of the proper application of the INA; (2) Contains non-responsive content on the Department's interim final rule on public charge; and (3) Redacts names of Department of State officials below the Deputy Assistant Secretary (DAS) level.