

Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juweiya Abdiaziz ALI, et al.,

Plaintiffs,

v.

Donald TRUMP, et al.,

Defendants.

Case No.: 2:17-cv-00135-JLR

PRAECIPE

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

The previously filed declaration of Mozhddeh Oskouian in support of Plaintiffs, Dkt. 56, was filed on March 10, 2017, with an electronic signature. Please replace the previously filed declaration with the corrected declaration containing an original signature attached hereto.

DATED this 13th day of March, 2017.

Respectfully submitted,

s/Matt Adams

Matt Adams, WSBA No. 28287

s/ Mary Kenney

Mary Kenney, *pro hac vice*

s/Glenda Aldana

Glenda M. Aldana Madrid, WSBA No. 46987

s/ Aaron Reichlin-Melnick

Aaron Reichlin-Melnick, *pro hac vice*

s/Maria Lucia Chavez

Maria Lucia Chavez, WSBA No. 43826

s/Melissa Crow

Melissa Crow, *pro hac vice*

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s/ Trina Realmuto
Trina Realmuto, *pro hac vice*

s/ Kristin Macleod-Ball
Kristin Macleod-Ball, *pro hac vice*

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9 OF THE NATIONAL LAWYERS GUILD
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CERTIFICATE OF SERVICE

I, Glenda Aldana Madrid, hereby certify that on March 13, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record for all Defendants.

Executed in Seattle, Washington, on March 13, 2017.

s/ Glenda Aldana Madrid
Glenda Aldana Madrid, WSBA No. 46987

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Honorable James L. Robart

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**DECLARATION OF MOZHDEH
OSKOUIAN
IN SUPPORT OF PLAINTIFFS**

I, Mozhdeh Oskouian, declare under penalty of perjury as follows:

1. I am over the age of eighteen, am competent to testify to the matters below, and make this declaration based on personal knowledge.
2. I am an attorney at the Northwest Immigrant Rights Project in Seattle, Washington. Our office represents Mr. Gholamreza Shahri, an 84-year-old United States citizen, in conjunction with his family visa petition for his daughter, Ms. Shahrzad Shahri, an Iranian citizen.
3. Mr. Shahri has been recently diagnosed with various age-related illnesses and has had to rely on Shahrzad Shahri, his youngest daughter, for care. For this reason, Mr. Shahri has had to reside in Iran for longer periods than what he intended or preferred.
4. Mr. Shahri filed a family visa petition for his daughter on July 17, 2009 and paid the required filing fee. The family visa petition was approved on October 25, 2011.

1 5. In March 2016, Ms. Shahri's priority date became current, meaning she could finally
2 begin the consular process to actually obtain an immigrant visa. Mr. Shahri and his three
3 children—two of whom are also United States citizens—were very glad when Ms. Shahri's visa
4 number became current and she began consular processing.

5 6. On December 28, 2016, Ms. Shahri received notice that she had been scheduled for an
6 immigrant visa interview in Abu Dhabi, United Arab Emirates, on February 12, 2017. Ms.
7 Shahri purchased a plane ticket, reserved a hotel room, and incurred other necessary expenses in
8 preparation for her interview.

9 7. On January 28, 2017, Ms. Shahri received notice that due to the Executive Order issued
10 on January 27, 2017 her interview appointment had been cancelled. She was told that she would
11 be contacted when the National Visa Center was able to reschedule her immigrant visa interview.
12 On February 8, 2017, Ms. Shahri emailed the National Visa Center asking for clarification on the
13 process in light of the injunction against the Executive Order issued by the United States District
14 Court.

15 8. On February 10, 2017, Ms. Shahri received an updated notice from the National Visa
16 Center, informing her that United States embassies and consulates overseas have resumed
17 interviewing immigrant visa applicants. Ms. Shahri was rescheduled for an Immigrant Visa
18 interview on March 21, 2017.

19 9. Ms. Shahri again purchased a plane ticket, reserved hotel accommodations, scheduled her
20 medical examination, and made all other necessary arrangements to attend her interview. This
21 time, the expense of Ms. Shahri's travel arrangements were even more substantial as none of the
22 expenses were refunded due to proximity of her interview date to the Iranian New Year.

23 10. On March 6, 2017, the Administration issued a new Executive Order, again banning
24 citizens of Iran and five other countries from travel to the United States. This ban is to go into
25 effect on March 16, 2017, five days prior to Ms. Shahri's interview.
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1 11. On March 7, 2017, Ms. Shahri received an email notice informing her of the March 6,
2 2017 executive order. It was unclear whether her March 21, 2017 interview would be cancelled.
3 Ms. Shahri is unable to recover the expenses she incurred in making the travel arrangements.
4 She intends to travel to Abu Dhabi to at least complete her medical examination, while she
5 awaits the scheduling of a *third* immigrant visa interview.
6

7 12. Mr. Shahri and Ms. Shahri are both worried over the future costs they will have to incur,
8 especially considering the unstable exchange rate between Iran's rial and U.S. dollar. All of Mr.
9 Shahri's children are worried about Mr. Shahri's health and the uncertainty regarding when they
10 will be able to finally be reunited in light of the Administration's chaotic immigration policies.
11

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct to the best of my information, knowledge, and belief.
14

15 Executed on this 13th day of March, 2017, in Seattle, Washington.
16

17 
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