

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

John Doe, Jack Doe, Jason Doe, Joseph Doe  
James Doe, Jeffrey Doe, individually, and on  
behalf of all others similarly situated; the  
Episcopal Diocese of Olympia, and the Council  
on American Islamic Relations-Washington,

Plaintiffs,

v.

Donald Trump, President of The United States;  
U.S. Department of State; Rex Tillerson,  
Secretary of State; U.S. Department of  
Homeland Security; Elaine Duke, Acting  
Secretary of Homeland Security; U.S. Customs  
and Border Protection; Kevin McAleenan,  
Acting Commissioner of U.S. Customs and  
Border Protection; Michele James, Field  
Director of the Seattle Field Office of U.S.  
Customs and Border Protection; Office of the  
Director of National Intelligence; and Daniel  
Coats, Director of the Office of the Director of  
National Intelligence,

Defendants.

No. 2:17-cv-00178-JLR

SUPPLEMENTAL DECLARATION OF  
JOSEPH DOE IN SUPPORT OF  
MOTION FOR PRELIMINARY  
INJUNCTION

1 I, "Joseph Doe," do hereby declare and state:

2 1. I have personal knowledge of the matters contained herein and, where I do not  
3 have direct knowledge, I believe them to be true and correct based upon the information  
4 available to me.

5 2. Over the past several months, I have called the immigration department at the  
6 United States Embassy in Nairobi many times about the status of my I-730 petitions for my wife  
7 and children.

8 3. As of October 2017, we were still waiting for the results from the medical  
9 examinations of two of my three children. The medical clearances are only good for 6 months, so  
10 although my family had passed their medical examinations before, those clearances expired on  
11 August 1, 2017. They all had to redo the medical examinations, and it can take a few months to  
12 get the results.

13 4. On November 5, 2017, I called the immigration department of the United States  
14 Embassy in Nairobi for another update.

15 5. The embassy staff member told me that the outstanding medical examinations for  
16 my two children had been completed, and the results were perfect. He told me that my family's  
17 medical exam results had been sent to RSC.

18 6. "RSC" is Resettlement Support Center Africa. It provides refugee processing  
19 services in support of the U.S. Refugee Admissions Program. Basically, RSC coordinates all the  
20 parts of the screening process for refugees and follow-to-join family members like my family.

21 7. Because all my family's clearances are complete, the next step should be that my  
22 family's case is transferred to IOM (International Organization for Migration), which sets up the  
23 loans for refugees to pay for their travel and books the flights. As I understand the process, RSC  
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1 is only waiting for word from DHS. DHS has to approve the travel in order for RSC to send the  
2 case to IOM for travel booking. The person I spoke with at the Embassy did not know the reason  
3 for this extra delay.

4 8. On November 21, 2017, I contacted the Embassy again for another update. The  
5 Embassy representative informed me that everything was okay except for that travel for Somalis  
6 is on hold. They do not have authorization from the U.S. government to forward Somali cases  
7 on for travel to the U.S.

8 9. My two youngest children are considered Somali nationals. My wife is a native-  
9 born Kenyan. Our oldest child is my stepson, and he is also Kenyan. Our two younger children  
10 are considered Somali because of my nationality, even though they were born in Kenya and have  
11 never been to Somalia.

12 10. The Embassy representative said that my wife and our oldest child could have  
13 their cases forwarded to IOM for travel booking because they are Kenyan, but our 4-year-old and  
14 5-year-old would not be able to travel because they are Somali. But this is not really an option.  
15 My children are already missing their father, and I can't imagine them not having their mother  
16 either.

17 11. Every day that I am separated from my family is hard for me, and this separation  
18 is hard on my wife and kids too. I have been feeling a lot of stress every day waiting for news.

19 12. I am Somali, and I have been living in the U.S. for nearly four years now. I am  
20 only one year away from becoming a citizen of this country. I hope that the U.S. government  
21 will allow my children to travel to this country to be with me.  
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EXECUTED this 21 day of November, 2017 at SeaTac, Washington.



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Joseph Doe