

The Honorable James L. Robart

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN DOE, et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

CASE NO. C17-0178JLR

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

(RELATING TO CASE NO. C:17-0178JLR)

JEWISH FAMILY SERVICES, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

CASE NO. C17-1707JLR

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

SECOND SUPPLEMENTAL
DECLARATION OF JOSEPH
DOE IN SUPPORT OF MOTION
FOR PRELIMINARY
INJUNCTION
(2:17-cv-00178-JLR) - 1

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

4 2. In order to get the required medical examinations to be cleared for travel to the
5 United States, my family has to travel to Nairobi to go to the IOM (International Organization
6 for Migration) health clinic. This is a journey of nearly 500 miles one way from where they live.
7

8 3. They have to travel by bus, and the trip is risky because the roads are not great
9 and accidents are common. And my wife has to travel by herself with three young children.

10 4. Once they get to Nairobi, they need to stay in a hotel for a few days, because they
11 are given a window of several days when they will be seen but don't know exactly which day
12 they will be seen at the clinic. The clinic is for migrants and refugees, and there is always a long
13 wait as many families are waiting for their examinations. The clinic calls them the night before
14 to tell them to arrive at 7:00am the next morning. So they have to be ready and waiting in
15 Nairobi.
16

17 5. Paying for their lodging and transportation is expensive, and I send them extra
18 money to cover it. They also have to pay the taxi fare to IOM from the hotel.

19 6. They have had two rounds of medical examinations so far. The medical
20 clearances expire after six months, and their first round of clearances expired in early August
21 2017. They are now in danger of having their second medical clearances expire. Their clearances
22 will expire in late February 2018.
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EXECUTED this 20th day of December, 2017, at SeaTac, Washington.



Joseph Doe