

EXHIBIT 44

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: j davidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

14 THEODORE J. BOUTROUS, JR. (SBN 132099)
15 ETHAN D. DETTMER (SBN 196046)
16 JESSE S. GABRIEL (SBN 263137)
17 GIBSON, DUNN & CRUTCHER LLP
18 333 South Grand Avenue
19 Los Angeles, CA 90071-3197
20 Telephone: (213) 229-7000
21 Facsimile: (213) 229-7520
22 Email: tboutrous@gibsondunn.com,
23 edettmer@gibsondunn.com,
24 jgabriel@gibsondunn.com
25 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
26 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
27 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
28 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF SAUL JIMENEZ

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, SAUL JIMENEZ, DECLARE:

2 1. I am a party in the above-captioned action. I make this declaration based on my personal
3 knowledge. If called as a witness, I could and would testify competently on the facts stated herein.

4 **Immigration to the United States and Childhood**

5 2. I was brought to the United States by my parents on my first birthday, July 8, 1988, from
6 Colima, Mexico. My family settled in the Boyle Heights neighborhood in Los Angeles, where they
7 have lived ever since arriving in the U.S. I have not left the United States since that time, and I have no
8 memories of Mexico.

9 3. I attended public schools in Boyle Heights from preschool through high school. As a
10 freshman in high school, I earned money to help support my family by delivering advertisements from
11 stores door-to-door. I later washed dishes and worked as a cook at an Italian restaurant.

12 4. At the age of 11, I started playing football through a youth league while enrolled at
13 Hollenbeck Middle School in Boyle Heights. I fell in love with the sport immediately, and continued
14 playing through my time at Roosevelt High and, ultimately, through college. At Roosevelt High, I
15 became the captain of my football team, was voted the team's Most Valuable Player, and was selected
16 for the California All-Eastern League football team as a wide receiver.

17 5. Although I knew that I was undocumented growing up, I only first began to understand
18 the consequences of that during high school, when my football coach at Roosevelt High tried to help me
19 to get a job and my options were limited because of my immigration status. It was only then that I
20 began to realize the limitations my immigration status would have on my life and opportunities.

21 6. At that time, I had strongly considered becoming a firefighter. I wanted to do a job that
22 involved physicality because of my football background, and I was also drawn to a job that would allow
23 me to help others in my community. Becoming a firefighter seemed like the perfect fit. I even signed
24 up for and began to attend the firefighter academy in my senior year. After a week in the academy,
25 however, it became apparent that I could not become a firefighter without legal status in the U.S. I left
26 the academy and began to fully come to terms with the impact that my undocumented status would have
27 on my ability to do the things that I wanted to do in my life.
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1 **Educational Background**

2 7. After leaving the firefighter academy, a coach from the East Los Angeles Community
3 College approached me while I was at football practice to ask if I wanted to continue playing football in
4 college. I ended up playing football there for two years. In addition to attending classes and football
5 practice, I also worked two jobs, one in a warehouse and one in a 99-cent store, so that I could continue
6 to support myself and my family, as well as to pay for my education.

7 8. After my first year at East Los Angeles Community College, I took one year off from
8 football so that I would have time to help my dad, who was struggling financially. I worked at the
9 warehouse, but found it difficult being away from football, and still dreamed of obtaining a college
10 education. I returned to playing football for my third academic year at East Los Angeles Community
11 College with a renewed sense of commitment to football and school.

12 9. I was determined to transfer to a four-year college where I could keep playing football
13 and could obtain a college degree. In 2007, I received a football scholarship to attend Oklahoma
14 Panhandle State University and transferred there for my junior and senior years. This football
15 scholarship was crucial because I was not able to get federal financial aid due to my undocumented
16 status. I was the first one in my family to attend college, and one of only a small percentage of students
17 from my high school to attend college as well. Although I knew that my immigration status meant that I
18 would not be able to obtain a job utilizing my college degree, I wanted to go to college to make myself,
19 my family, and my community proud and to broaden my understanding of the world outside of Boyle
20 Heights. I embraced football and my classes, and tried to be the best player and student that I could be.

21 10. While at Oklahoma Panhandle State, I served as the captain of my football team and was
22 voted the team's Most Valuable Defensive Player—then playing as an outside linebacker. I played on
23 the team for two years and then stayed an extra semester to be a student-coach. I also started to mentor
24 high school youth through the U.S. Department of Education's Upward Bound program while attending
25 Oklahoma Panhandle State. It was in this program that I quickly realized how much I enjoyed teaching
26 young people and inspiring them to grow and to improve themselves. I visualized myself becoming a
27 teacher and coach from this time onwards. At the same time, I knew that this dream was out of my
28 reach given my immigration status. While this was difficult for me, I had at that point come to expect

1 and accept that I would never be able to obtain a professional lifestyle and to truly make something of
2 myself.

3 **Awareness and Understanding of DACA**

4 11. After graduating from Oklahoma Panhandle State in the spring of 2010, I returned to
5 Boyle Heights, working in low wage jobs in warehouses and restaurants to support my parents and
6 myself. Although I now had a college degree, before obtaining DACA status, I never made more than
7 \$7.25 per hour. When Congress introduced the DREAM Act in 2010, I began to imagine a better future
8 for myself and my family—one where I would become a teacher and coach in my old community in
9 Boyle Heights—only to find my hopes dashed when the Act failed to pass by five votes. I can clearly
10 remember watching the votes come in on C-SPAN on my laptop. The psychological and emotional toll
11 that this took on me was agonizing. I envisioned myself doing minimum wage work forever, in
12 warehouses and restaurants, in order to support my mom and dad. I felt as though the rug had been
13 pulled out from under me.

14 12. Then, in June 2012, I heard about the Deferred Action for Childhood Arrivals (“DACA”)
15 program. I once again allowed myself to imagine a different and better future, and finally felt a renewed
16 sense of hope. I immediately started to think about how I could improve my resume so that I could
17 ultimately work towards becoming a full time teacher.

18 13. The news about DACA spread quickly in my community. I educated myself about the
19 program by researching it online, and I soon learned that I would be able to renew my DACA status
20 every two years and that the government would not use my personal information for purposes other than
21 the DACA program. Both of these were important elements of the program to me; the first because it
22 meant that I could invest in a long term career, and the second because it meant that the Government
23 would not use information I submitted to them to deport myself or my family.

24 14. In applying for the DACA program, I placed my trust in the U.S. Government. I felt
25 comfortable trusting the Government because I believe that when the Government provides you with
26 information about a new program or benefit, like the DACA program, they are not going to do a bait-
27 and-switch to then use the information provided to them for the purpose of deporting or otherwise
28 harming the people they promised to help. Part of the reason that I felt I could trust the Government was

1 because of the very specific details and requirements of the DACA program – the program required
2 applicants to be under 31 years old, to have arrived in the country before the age of 16, and to have
3 continuously lived in the U.S. for at least five years, amongst other things. It was clear to me that the
4 Government had put a lot of thought into coming up with these specific requirements, and to me when
5 the Government has a particularized plan and procedures for how to help a certain community (in this
6 case, the immigrant community) this means that they intend to follow through with and continue to carry
7 out that plan.

8 15. Given the very specific requirements of the program, which I researched thoroughly, I
9 was confident that my DACA application would be approved if I applied. I did not have a criminal
10 record and I was well within the qualifications and requirements of the program; to me, it seemed as
11 though I was a perfect fit. The only concern I had was whether I would fill out the application correctly,
12 which is why I enlisted the services of attorneys at the Armando Villegas & Associates law firm and
13 paid them \$1965.00 to assist me in completing my application. I paid for their help and for the
14 application fee from my own savings, which I had earned through my many part-time jobs over the
15 years.

16 16. I was even more confident that my application would be approved when I applied for
17 renewal of my DACA status. The requirements of the program remained the same as the first time I
18 applied, and because I had already gone through the process and been approved before, it seemed almost
19 certain that I would be approved again. Applying for renewal therefore became routine, and I had the
20 expectation that I would receive renewal at the end of every two years. And, in fact, I did.

21 17. I also felt encouraged by the U.S. Government to apply for renewal each time. Every two
22 years, approximately 90 days before my DACA status was set to expire, I received an email from the
23 Government reminding me about my renewal deadline. These emails specifically stated: “Don’t Let
24 Your Work Permit Expire; Follow These DACA Renewal Tips.” Attached as Exhibit A is a true and
25 correct copy of one such email that I received from U.S. Citizenship and Immigration Services
26 (“USCIS”) on June 21, 2015. I also received paper renewal notices by mail reminding me to renew by a
27 specific date. Attached as Exhibit B is a true and correct copy of one such Form I-797C Notice of
28

1 Action reminding me that my “current period of deferred action [would] expire in 100 days,” which I
2 received from USCIS on June 26, 2017.

3 **DACA Applications and Approvals**

4 18. I first applied for DACA status on October 22, 2012. Attached as Exhibit C is a true and
5 correct copy of the DACA Application (Form I-821D) that I submitted to USCIS on October 22, 2012.
6 Attached as Exhibit D is a true and correct copy of the Form I-797C Notice of Action that I received
7 from USCIS on October 25, 2012, acknowledging receipt of my 2012 DACA Application. Attached as
8 Exhibit E is a true and correct copy of the Form I-797C Notice of Action that I received from USCIS on
9 October 29, 2012, informing me of my biometrics appointment in connection with my DACA
10 application.

11 19. I also applied for employment authorization on October 22, 2012. Attached as Exhibit F
12 is a true and correct copy of the Form I-765 Application for Employment Authorization that I submitted
13 to USCIS on October 22, 2012. Attached as Exhibit G is a true and correct copy of the Form I-765WS
14 (Application for Employment Authorization Worksheet) that I submitted to USCIS on October 22, 2012.
15 Attached as Exhibit H is the Form I-797C Notice of Action that I received from USCIS on October 25,
16 2012, acknowledging receipt of payment for my Application for Employment Authorization.

17 20. I received approval of my DACA application on January 30, 2013. Attached as Exhibit I
18 is a true and correct copy of the Form I-797 DACA Application Approval Notice that I received from
19 USCIS on January 30, 2013.

20 21. I also received employment authorization on January 30, 2013. Attached as Exhibit J is a
21 true and correct copy of the Form I-797 Application for Employment Authorization Approval Notice
22 that I received from USCIS on January 30, 2013. Attached as Exhibit K is a true and correct copy of the
23 mailing that I received from USCIS on January 31, 2013 with my employment authorization card.

24 22. I applied for renewal of my DACA status on November 3, 2014. Attached as Exhibit L is
25 the Form I-797C Notice of Action that I received from USCIS on November 5, 2014, acknowledging
26 receipt of my 2014 DACA Application. Attached as Exhibit M is a true and correct copy of the Form I-
27 797C Notice of Action that I received from USCIS on November 7, 2014, informing me of my
28 biometrics appointment in connection with my DACA application.

1 23. I also applied for renewal of my employment authorization on November 3, 2014.
2 Attached as Exhibit N is a true and correct copy of the Form I-765 Application for Employment
3 Authorization that I submitted to USCIS on November 3, 2014. Attached as Exhibit O is the Form I-
4 797C Notice of Action that I received from USCIS on November 5, 2014, acknowledging receipt of
5 payment for my Application for Employment Authorization.

6 24. I received approval of my first DACA renewal application on December 29, 2014, and
7 also received a renewed employment authorization card around that time. Attached as Exhibit P is a true
8 and correct copy of the Form I-797 DACA Application Approval Notice that I received from USCIS on
9 December 29, 2014. Attached as Exhibit Q is a true and correct copy of the mailing that I received from
10 USCIS on December 31, 2014 with my employment authorization card.

11 25. On May 12, 2015, I applied for a Social Security card, which I received from the U.S.
12 Government approximately two weeks later. Attached as Exhibit R is a true and correct copy of a
13 receipt from the Social Security Administration regarding my application for a Social Security card,
14 dated May 12, 2015.

15 26. I applied for renewal of my DACA status a second time on August 3, 2017. Attached as
16 Exhibit S is the Form I-797C Notice of Action that I received from USCIS on August 7, 2017,
17 acknowledging receipt of my 2017 DACA Application. Attached as Exhibit T is a true and correct copy
18 of the Form I-797C Notice of Action that I received from USCIS on August 12, 2017, informing me of
19 my biometrics appointment in connection with my DACA application.

20 27. I received approval of my second DACA renewal application on September 8, 2017. My
21 DACA status will expire on September 7, 2019. Attached as Exhibit U is a true and correct copy of the
22 Form I-797 DACA Application Approval Notice that I received from USCIS on September 8, 2017.

23 28. I applied for renewal of my employment authorization on August 3, 2017, and received
24 my renewed employment authorization card in September 2017. Attached as Exhibit V is a true and
25 correct copy of the Form I-797C Notice of Action that I received from USCIS on August 7, 2017,
26 acknowledging receipt of my 2017 Application for Employment Authorization. Attached as Exhibit W
27 is a true and correct copy of the mailing that I received from USCIS on September 13, 2017 with my
28 employment authorization card.

1 29. When I learned that my DACA application had been accepted I felt excited and
2 overjoyed. I knew that many doors would suddenly be opening for me and that I would now have many
3 new opportunities if I just worked hard to obtain them. I began to look forward to my future and to the
4 new life that I would now be able to have.

5 **Professional, Personal, and Other Benefits Provided by DACA**

6 30. Before obtaining DACA status, there were a number of benefits that I was unable to
7 obtain, in addition to my inability to obtain a full time job. As mentioned above, I could not get a
8 driver's license, which is a necessity when living in the Los Angeles area. Because I did not have a
9 social security card or other form of U.S. Government identification, I could not get credit cards. I also
10 could not get an apartment lease or car lease because I did not have a social security number. After
11 graduating from college, I was forced to move back in with my parents since I could not rent (or afford)
12 my own place to live. I was also unable to fly anywhere even within the United States because I lacked
13 identification.

14 31. As soon as I obtained DACA status, however, I immediately started to make use of the
15 newfound benefits to which I was now entitled and the many doors that had suddenly opened up for me.
16 I applied for and got three part-time jobs in order to build out my resume. The first was as a sports
17 coach for an after school program for the Los Angeles Unified School District. The second was as a
18 Math and English tutor for Leading Edge Tutors. The third was an overnight position managing an
19 adolescent rehabilitation center.

20 32. After three months working these three part-time jobs, I accepted a full-time job as a
21 Program Coordinator with the national nonprofit HealthCorps in the summer of 2013, and was placed at
22 my former high school, Roosevelt High. Obtaining this job was a turning point in my life and my
23 career; it was the first time that I was able to use my college education as a full time educator and to earn
24 a full time salary in a job that required a college degree.

25 33. In this role, I worked part of the time teaching and part of the time coordinating health
26 activities at the high school, tailoring the programming to the schools' individual needs. I facilitated
27 fitness, nutrition, and leadership advocacy clubs to teach students healthier habits; coordinated with
28 teachers to integrate nutrition lessons into their curriculums; and promoted health awareness events on

1 campus and in the community. I even mobilized students to participate in a gardening club and a fitness
2 club. I began to learn and understand what it meant to work at a high school full time, interacting with
3 the administrators, tutors, and teachers on a daily basis. I relished being in front of my own classroom
4 of students and helping them to grow and learn every day, and I especially enjoyed doing so back where
5 I was formerly a student myself.

6 34. As soon as I began working at Roosevelt High, I also took on coaching positions at the
7 school, and even continued on as a coach after I left the HealthCorps program. Between 2013 and 2017,
8 I served as the Assistant Football Coach for the boy's Varsity team, Head Football Coach for the boy's
9 Junior Varsity team, and Head Soccer Coach for the girl's Junior Varsity team.

10 35. Although my position with HealthCorps was meant to last only two years, I was asked to
11 stay on at Roosevelt High by the program's funders for an additional year. At the end of my third year
12 with HealthCorps, in August 2016, I accepted a position as a substitute teacher in the Los Angeles
13 Unified School District, where I taught general and special education classes at the middle school and
14 high school level.

15 36. About one year later, I was contacted by Stevenson Middle School about a full time
16 position as a special education teacher. I now teach the special education special day class at Stevenson
17 Middle School, which involves teaching math, U.S. history, and world history to a group of students
18 with mild to moderate learning disabilities. I find teaching special education classes particularly
19 rewarding and meaningful, given the smaller class sizes and my ability to truly make a difference in the
20 lives of these students who face unique and significant challenges. Not only do I identify with these
21 students because they are growing up in the same community—Boyle Heights—that I grew up in, but I
22 can also empathize with their day to day experiences. Many of them face bullying at school, something
23 that I too experienced while growing up.

24 37. When I began working at Stevenson Middle School, I was accepted into the Los Angeles
25 Unified School District Intern Program, which is an Alternative Teacher Certification Program
26 accredited by the State of California. The District Intern Program is a two-year program that involves
27 simultaneously teaching and taking classes, and at the end of the two years participants become fully
28 certified teachers. I am now six months into the program and have a year and a half left to complete.

1 38. In addition to my current job and position in the District Intern Program, none of which
2 would have been possible without DACA, having DACA status has enabled me to obtain a number of
3 other significant benefits that I was not able to get before. I now have a California driver's license so
4 that I can travel between home and work and to visit my family and friends. I have also been able to
5 obtain several credit cards using my social security number, which has enabled me to begin building my
6 credit with the hope that I will one day be able to purchase a home and a car. I have also entered into a
7 four-year car lease as well as a month-to-month apartment lease. The ability to rent my own apartment
8 was especially important and rewarding for me, since it meant that I could finally move out of my
9 parents' home and gain independence as a full-fledged adult.

10 39. Being able to work a full-time job earning more than minimum wage has also enabled me
11 to provide financial support for my parents. I pay all of the bills at my parents' house except the light
12 bill, which my younger brother pays.

13 40. Additionally, through my job at Stevenson Middle School, I am now paying into social
14 security, Medicare, and employment disability insurance.

15 41. I have also been able to travel within the United States since obtaining DACA status,
16 since I can now use my license to fly domestically. Since obtaining DACA, I have flown to Texas,
17 Arizona, Illinois, Nevada, and New York. I traveled to New York for a training program to enhance my
18 professional development while employed with HealthCorps.

19 42. It is my goal to obtain a master's degree in education and to continue teaching and
20 coaching for the remainder of my professional life in the Boyle Heights area. I would like to spend my
21 career molding and enriching the lives of young people within the same community in which I grew up,
22 particularly those with special education needs.

23 Potential Impact of Losing DACA Status

24 43. Losing my DACA status would be devastating. Being without legal status is emotionally
25 painful and challenging, and I would be distraught to have to return to a state of limbo with respect to
26 my ability to remain in this country. I remember a time in college, when I tore my MCL during a
27 football game at Oklahoma Panhandle State. When I arrived at the hospital, the nurse refused to admit
28 me because I did not have a social security number, even though I was entitled to health care through the

1 school. It was at that moment that the impact and weight of being undocumented truly hit me, and I
2 thought about my sisters and my parents and the pain that they too have gone through. All of the
3 feelings that I had bottled inside came to a head, and all of the anger, fear, and anxiety that I had grown
4 up with finally came out. I was a linebacker and I found myself crying in my smentor's car in the
5 parking lot of that hospital. Although I was eventually able to receive treatment for my torn MCL, I
6 carry this story with me each day.

7 44. I also would be deprived of a number of important benefits in my life. First, I would not
8 be able to complete the District Intern Program to become a fully certified teacher. This is because work
9 authorization is required to complete the program, and without my DACA status and the related work
10 authorization I would no longer be able to teach at Stevenson Middle School. My ability to financially
11 support myself and my family would be significantly hampered if I were no longer able to be employed
12 as a full time teacher.

13 45. I also would not complete a master's degree in education without DACA status, as I
14 would only be able to afford to attend if I qualified for financial aid and could otherwise work to help
15 pay for the degree, and there would be no future for me professionally after doing so without DACA.

16 46. In addition, I would no longer be able to travel even within the country if my DACA
17 status were taken away.

18 47. I would also lose the sense of security and comfort that I feel in knowing that I will not
19 be deported from the country and taken from the only home and family that I have ever known and
20 loved. All of my immediate family resides in the United States, and I do not have any ties or
21 connections to Mexico. My younger brother was born in this country and is a U.S. citizen. My older
22 sister is also a DACA recipient, while my father is legally present in this country and has a valid social
23 security card. If I were forced to leave the country, I would be separated from them and I would have to
24 live in a country I don't know.

25 48. If I lose my DACA status, I would also no longer be able to give back to the Los Angeles
26 community by serving as a teacher, coach, and mentor to my students, many of whom are the sons and
27 daughters of people I went to high school with in Boyle Heights.
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1 49. Before DACA, I had grown to accept – and almost become numb to – the idea that I
2 would have few opportunities in this country and would not be able to become a professional, as that
3 was all that I had ever known. Now that I have had a taste of success and opportunity through the
4 DACA program, however, it would be particularly heartbreaking to have all of my success and
5 opportunities ripped away.

6 50. I have now come to expect a different life for myself and my family than the one I knew
7 before becoming a DACA recipient. I have come to expect more for myself and have, in turn, been able
8 to give back more to the community than I would have ever expected. Being a teacher and a coach is
9 who I am, and I do not know what the future would hold for me if I were no longer able to teach and
10 coach in my community. If I had my DACA status taken from me, I would feel like the Government
11 had broken its promise to me.

12 51. I have already begun to feel the impact of the rescission of DACA on my life. Although I
13 continue to try to be the best teacher I can be and do the best job that I can do, it is difficult to go
14 through each day with the stress and anxiety that I currently feel because of the uncertainty surrounding
15 my future. It is incredibly difficult to create lesson plans, complete reports, remain positive in front of a
16 classroom full of students, and carry out my daily routine when in the back of my mind is the constant
17 fear that in a short period of time this may all be taken away.

18 52. Further, the rescission of the DACA program has already impacted professional decisions
19 that I have made to since the announcement of the program's termination. Before DACA was
20 terminated, I was planning to apply for master's programs in education, in order to improve as a teacher
21 and to enhance my professional capabilities and opportunities. Now that the program is ending,
22 however, I have chosen not to apply because I am not sure if I will be permitted to remain in the country
23 or to continue working as a teacher. I have also been forced to question whether I can or should
24 continue paying rent for my apartment or whether I should pull out of the rental agreement and move
25 back in with my parents instead, given that I may not have be able to continue to afford my rent if I lose
26 my job as a teacher. Thinking of moving back in with my parents and relying on them for financial
27 support as a 30-year-old man weighs on me heavily.

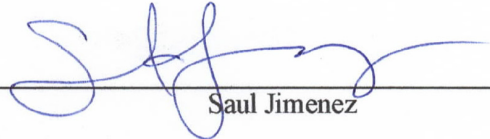
28

1 53. I hope that I am continued to be given the opportunity to remain in the country that I call
2 home, so that I can work to provide for my family and to give back to my community in a positive and
3 significant way. As I wrote in my first Application for Employment Authorization Worksheet back in
4 2012, attached herein as Exhibit G, "I would like to one day own a home, finish paying my student loans
5 and most importantly, aid my parents economically. It is my desire[] to be able to work within my own
6 field and strive to acquire the American Dream."

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

Executed on October 29, 2017, in Los Angeles, California.



Saul Jimenez

EXHIBIT A

Redacted - Attorney-client privileged

----- Forwarded message -----

From: "U.S. Citizenship and Immigration Services" <uscis@public.govdelivery.com>

Date: Jun 21, 2015 8:26 AM

Subject: U.S. Citizenship and Immigration Services Weekly Digest Bulletin

To: [REDACTED]

Cc:



Don't Let Your Work Permit Expire; Follow These DACA Renewal Tips

06/15/2015

Some people wait too long to request [DACA](#) renewal or do not correctly submit all the required forms and fees. As a result, their Employment Authorization Documents may expire before USCIS can finish processing their requests for DACA renewal.

You can lessen the chance that this may happen if you:

- **File on time.** Submit your renewal request between 150 days and 120 days before the expiration date listed on your current Form I-797 DACA approval notice and Employment Authorization Document.
- **Correctly submit all required forms and fees.** USCIS will reject your renewal request unless you properly submit:
 - [Form I-821D, Consideration of Deferred Action for Childhood Arrivals;](#)
 - [Form I-765, Application for Employment Authorization;](#)
 - [Form I-765 Worksheet;](#) and
 - Required fees of \$465
- **Avoid processing delays.** Be sure to submit:
 - Any new documents and information related to removal proceedings or criminal history that you have not already submitted to USCIS in a previously approved DACA request,

- Proof of advance parole if you have traveled outside the United States since you filed your last DACA request that was approved; and
- Proof of any legal name change.
- **Respond to Requests for Evidence.** USCIS may deny your renewal request if you do not respond to a Request for Evidence in a timely manner.

For complete instructions, go to the [Consideration of Deferred Action for Childhood Arrivals \(DACA\)](#) page.

Since March 27, 2015, USCIS has been mailing renewal reminder notices to DACA recipients 180 days before the expiration date of their current period of deferred action. Previously, these reminder notices were mailed 100 days in advance. The earlier notices are intended to ensure that DACA recipients are reminded before the start of the recommended renewal period and have sufficient time to prepare their renewal requests.

USCIS' current goal is to process DACA renewal requests within 120 days. You may submit an inquiry about the status of your renewal request after it has been pending more than 105 days. To submit an inquiry online, please visit egov.uscis.gov/e-request, or call the National Customer Service Center at [1-800-375-5283](tel:1-800-375-5283) (TDD for the hearing impaired: [1-800-767-1833](tel:1-800-767-1833))

Please do not reply to this message. See our [Contact Us](#) page for phone numbers and e-mail addresses.



**U.S. Citizenship
and Immigration
Services**

STAY CONNECTED:



SUBSCRIBER SERVICES:

[Manage Preferences](#) | [Unsubscribe](#) | [Help](#)

U.S. Citizenship and Immigration Services sending to sauli44.si@gmail.com
20 Massachusetts Ave NW, Washington DC 20529 · [1-800-375-5283](tel:1-800-375-5283)

EXHIBIT B

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

RECEIPT NUMBER LIN-15-901-80448		CASE TYPE I821D CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS	
RECEIPT DATE November 4, 2014	PRIORITY DATE	APPLICANT [REDACTED]	
NOTICE DATE June 26, 2017	PAGE 1 of 1	JIMENEZ SUAREZ, SAUL	
SAUL JIMENEZ SUAREZ [REDACTED]		Notice Type: Notice of Action	

IF YOU HAVE ALREADY SUBMITTED YOUR REQUEST TO RENEW DEFERRED ACTION UNDER DACA, PLEASE DISREGARD THIS NOTICE.

Our records indicate that U.S. Citizenship and Immigration Services (USCIS) granted DACA in your case and that your current period of deferred action will expire in less than 180 days. If you wish to avoid a lapse in your period of deferred action and employment authorization, you **must** file a DACA renewal request with USCIS between 150 days and 120 days before the expiration date located on your current Form I-797 DACA approval notice and Employment Authorization Document (EAD). Form I-821D, Consideration of Deferred Action for Childhood Arrivals, was recently updated to allow for renewal filings and is available online at <http://www.uscis.gov/i-821d>. This form must be completed, properly signed and accompanied by a Form I-765, Application for Employment Authorization, and Form I-765WS, I-765 Worksheet.

Please be aware that if your current period of deferred action expires before you receive a renewal of DACA, you will accrue unlawful presence and will not be authorized to work. If you have not already done so, USCIS encourages you to submit your renewal request as soon as possible.

Deferred action is a discretionary determination to defer removal action of an individual as an act of prosecutorial discretion and each case will be considered on an individual, case-by-case basis. USCIS will notify you of its decision in writing.

For additional information on DACA, including documentation requirements for renewal or to download the required forms, please visit www.uscis.gov/childhoodarrivals. If you have already filed your renewal request with USCIS, please disregard this notice. You can check your case status online by visiting <https://egov.uscis.gov/cris/Dashboard.do>.

THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

NEBRASKA SERVICE CENTER
US CITIZENSHIP & IMMIGRATION SVCS
P.O. BOX 82521
LINCOLN NE 68501-2521

Customer Service Telephone: 800-375-5283



If you are visiting a field office and need directions, including public transportation directions, please see www.uscis.gov/fieldoffices for more information.

Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS. For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

NOTE: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

EXHIBIT C



**Consideration of Deferred Action
for Childhood Arrivals**
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-821D
OMB No. 1615-0124
Expires 02/28/2013

For USCIS Use Only	A- <input type="text"/>	Receipt	Action Block
	Case ID:		
	<input type="checkbox"/> Requestor interviewed on _____		
Returned: / /	Received: / /	Remarks	
Resubmitted: / /	Sent: / /		
To Be Completed by an Attorney or Accredited Representative, if any.		<input checked="" type="checkbox"/> Fill in box if G-28 is attached to represent the requestor.	Attorney State License Number: 196675

▶ **START HERE - Type or print in black ink.**

Part I. Information About You

I am requesting consideration of deferred action for childhood arrivals *and* I have included Form I-765, Application for Employment Authorization, and Form I-765WS, Form I-765 Worksheet.

Full Name

1.a. Family Name (Last Name)

1.b. Given Name (First Name)

1.c. Middle Name

Mailing Address

2.a. In Care of Name (if applicable)

2.b. Street Number and Name

2.c. Apt. Ste. Flr.

2.d. City or Town

2.e. State 2.f. Zip Code

Removal Proceedings Information

3.a. Are you now or have you ever been in removal proceedings? Yes No

If you answered "Yes" to the above question, you must check a box below indicating your current status or outcome of your removal proceedings.

3.b. Type of proceedings:

a. Currently in Proceedings c. Terminated

b. Administratively Closed d. Subject to a Final Order

3.c. Date and Location of Proceedings

**For USCIS
Use Only**

Part 1. Information About You (continued)

Other Information

4. Alien Registration Number (A-Number) (if any)
 ▶ A- 0 0 0 0 0 0 0 0 0 0
5. U.S. Social Security Number (if any)
 ▶ 0 0 0 0 0 0 0 0 0 0
6. Date of Birth (mm/dd/yyyy) ▶ [REDACTED]
7. Gender Male Female
- 8.a. City/Town/Village of Birth
 TECOMAN, COLIMA
- 8.b. Country of Birth
 Mexico
9. Country of Residence
 United States
10. Country of Citizenship/Nationality
 Mexico
11. Marital Status
 Married Widowed Single Divorced

Other Names Used (including maiden name)

If you require additional space, use Part 7., Additional Information.

- 12.a. Family Name (Last Name) JIMENEZ
- 12.b. Given Name (First Name) SAUL
- 12.c. Middle Name

U.S. Entry Information

13. Date of Initial Entry into the United States, on or about:
 (mm/dd/yyyy) ▶ 07/08/1988
14. Place of Entry into the United States.
 TIJUANA, BAJA CALIFORNIA, MEXICO

15. Status at Entry (e.g., B2, FI, J1, No Lawful Status, etc.)

WI - WITHOUT INSPECTION

- 16.a. Do you have an Arrival/Departure Record (I-94)?

Yes No

- 16.b. List your I-94 number (if applicable)

▶ [REDACTED]

17. Date authorized stay expired, as shown on Form I-94, I-95, or I-94W (if applicable)

(mm/dd/yyyy) ▶ [REDACTED]

Education Information

18. Current Education Status (e.g., In School, General Educational Development, High School Graduate)

COLLEGE GRADUATE

19. Name, City, and State of School Currently Attending or Where Education Received

OKLAHOMA PANHANDLE STATE UNIVERSITY

20. Date of Last Attendance, Graduation, Receipt of General Educational Development Certificate, and/or Completion Certificate (mm/dd/yyyy) ▶ 12/09/2010

Military Service Information

- 21.a. Were you a member of the U.S. Armed Forces or Coast Guard? Yes No

If you answered "Yes" to the above question, you must provide responses to Item Numbers 21.b. through 21.e.

- 21.b. Military Branch

[REDACTED]

- 21.c. Service Start Date (mm/dd/yyyy) ▶

[REDACTED]

- 21.d. Discharge Date

(mm/dd/yyyy) ▶

[REDACTED]

- 21.e. Type of Discharge

[REDACTED]

**For USCIS
Use Only**

Part 2. Arrival/Residence Information

1.a. I arrived in the United States on or before June 15, 2007.
 Yes No

1.b. I have been continuously residing in the United States since at least June 15, 2007.
 Yes No

NOTE: If you answer "No" to Item Numbers 1.a. or 1.b., use **Part 7., Additional Information**, to include a full explanation.

List your current address and, to the best of your knowledge, the addresses where you resided since your initial entry into the United States. If you require additional space, use **Part 7., Additional Information**.

Present Address

2.a. Dates at this residence (mm/dd/yyyy)
From: ▶ 01/10/2000 To: ▶ Present

2.b. Street Number and Name [Redacted]

2.c. Apt. Ste. Flr. [Redacted]

2.d. City or Town [Redacted]

2.e. State [Redacted] 2.f. Zip Code [Redacted]

Address 1

3.a. Dates at this residence (mm/dd/yyyy)
From: ▶ 01/01/1996 To: ▶ 01/09/2000

3.b. Street Number and Name [Redacted]

3.c. Apt. Ste. Flr. [Redacted]

3.d. City or Town [Redacted]

3.e. State [Redacted] 3.f. Zip Code [Redacted]

Address 2

4.a. Dates at this residence (mm/dd/yyyy)
From: ▶ 01/01/1992 To: ▶ 01/01/1996

4.b. Street Number and Name [Redacted]

4.c. Apt. Ste. Flr. [Redacted]

4.d. City or Town [Redacted]

4.e. State [Redacted] 4.f. Zip Code [Redacted]

Address 3

5.a. Dates at this residence (mm/dd/yyyy)
From: ▶ 01/01/1990 To: ▶ 01/01/1992

5.b. Street Number and Name [Redacted]

5.c. Apt. Ste. Flr. [Redacted]

5.d. City or Town [Redacted]

5.e. State [Redacted] 5.f. Zip Code [Redacted]

List all your absences from the United States since June 15, 2007. If you require additional space, use **Part 7., Additional Information**.

6.a. Departure Date 1 (mm/dd/yyyy) ▶ [Redacted]

6.b. Return Date 1 (mm/dd/yyyy) ▶ [Redacted]

6.c. Reason for Departure [Redacted]

7.a. Departure Date 2 (mm/dd/yyyy) ▶ [Redacted]

7.b. Return Date 2 (mm/dd/yyyy) ▶ [Redacted]

7.c. Reason for Departure [Redacted]

**For USCIS
Use Only**

Part 3. Criminal, National Security and Public Safety Information

If any of the following questions apply to you, use **Part 7., Additional Information**, to describe the circumstances and include a full explanation.

- 1. Have you ever been arrested for, charged with, or convicted of a felony or misdemeanor in the United States? *Do not include minor traffic violations that only resulted in a fine, unless it was alcohol- or drug-related.*
 Yes No

If you answered "Yes" you must also include copies of all arrest records, charging documents, dispositions (outcomes), sentencing records, etc.

- 2. Have you ever been arrested for, charged with, or convicted of a crime in any country other than the United States?
 Yes No

If you answered "Yes" you must also include copies of all arrest records, charging documents, dispositions (outcomes), sentencing records, etc.

- 3. Have you ever engaged in or do you continue to engage in or plan to engage in terrorist activities?
 Yes No
- 4. Are you now or have you ever been a member of a gang?
 Yes No

Have you ever engaged in, ordered, incited, assisted or otherwise participated in any of the following:

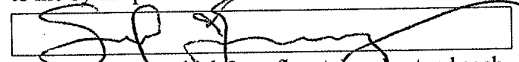
- 5.a. Acts involving torture, genocide, or human trafficking?
 Yes No
- 5.b. Killing any person?
 Yes No
- 5.c. Severely injuring any person?
 Yes No
- 5.d. Any kind of sexual contact or relations with any person who was being forced or threatened?
 Yes No

Part 4. Signature of Requestor

Requestor's Statement (check one)

- 1.a. I can read and understand English, and have read and understand each and every question and instruction on this form, as well as my answer to each question.

- 1.b. Each and every question and instruction on this form, as well as my answer to each question, has been read to me by the person named below

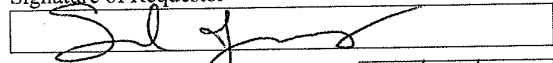


in a language in which I am fluent. I understand each and every question and instruction on this form, as well as my answer to each question.

Requestor's Certification

I certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct. Copies of documents submitted are exact photocopies of unaltered original documents, and I understand that I may be required to submit original documents to USCIS at a later date. Furthermore, I authorize the release of any information from my records that USCIS needs to reach a determination on deferred action.

- 2.a. Signature of Requestor



- 2.b. Date of Signature (mm/dd/yyyy) ▶

10/17/12

- 3. Daytime Phone Number



NOTE: Deferred action is unlikely to be considered for anyone who fails to completely fill out this form or to submit required documents listed in the instructions. Deferred action does not confer lawful status upon an individual. Furthermore, a decision on deferred action is wholly within the discretion of DHS.

**For USCIS
Use Only**

Part 5. Signature of Person Preparing This Request, If Other Than the Requestor

NOTE: If you are an attorney or representative, you must submit a completed Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative, along with this request.

1. Attorney or Representative: In the event of a Request for Evidence (RFE), may USCIS contact you by e-mail?
 Yes No

Preparer's Full Name

Provide the following information concerning the preparer:

- 2.a. Preparer's Family Name (Last Name)
 LARA
- 2.b. Preparer's Given Name (First Name)
 ALEJANDRA
3. Preparer's Business or Organization Name
 ARMANDO VILLEGAS & ASSOCIATES

Preparer's Mailing Address

- 4.a. Street Number and Name 12518 BEVERLY BLVD
- 4.b. Apt. Ste. Flr.
- 4.c. City or Town WHITTIER
- 4.d. State CA 4.e. Zip Code 90601

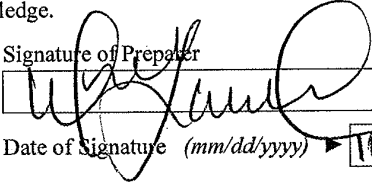
Preparer's Contact Information

5. Daytime Phone Number (5 6 2) 2 9 8 - 4 1 0 1
6. Email Address
 VILLEGASLAW@SBCGLOBAL.NET

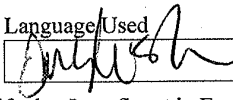
Preparer's Declaration

To be completed by all preparers, including attorneys and authorized representatives.

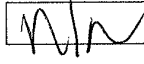
I declare that I prepared this Form I-821D at the requestor's behest, that it is based on all the information of which I have knowledge, and that the information is true to the best of my knowledge.

- 7.a. Signature of Preparer

- 7.b. Date of Signature (mm/dd/yyyy) 10/17/2012

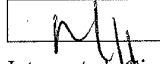
Part 6. Signature of Interpreter

1. Language Used


I certify that I am fluent in English and the language above. I further certify that I have read each and every question and instruction on this form, as well as the answer to each question, to this requestor in the above-mentioned language, and that the requestor has informed me that he or she has understood each and every instruction and question of the form, as well as the answer to each question.

- 2.a. Signature of Interpreter

- 2.b. Date of Signature (mm/dd/yyyy)

Interpreter's Information

- 3.a. Interpreter's Family Name (Last Name)

- 3.b. Interpreter's Given Name (First Name)

**For USCIS
 Use Only**

Part 7. Additional Information

If you require more space to provide any additional information within this request, please use the space below. If you require more space than what is provided to complete this request, you may use a separate sheet(s) of paper. You must include your full name on each sheet of paper along with the page number, Part Number, and Item Number related to your explanation.


Your Full Name

1.a. Family Name (Last Name)

1.b. Given Name (First Name)

1.c. Middle Name

2.a. Page Number 2.b. Part Number 2.c. Item Number

2.d. ADDRESS NO. 4


3.a. Page Number 3.b. Part Number 3.c. Item Number

3.d. N/A

4.a. Page Number 4.b. Part Number 4.c. Item Number

4.d. N/A

**For USCIS
Use Only**

EXHIBIT D

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE October 25, 2012
CASE TYPE I-821D, Consideration of Deferred Action for Childhood Arrivals		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER WAC1390089376	RECEIVED DATE October 22, 2012	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

SAUL JIMENEZ
C/O ARMANDO VILLEGAS 3 680
12518 BEVERLY BLVD
WHITTIER, CA 90601



NAME AND MAILING ADDRESS

The above case has been received by our office and is in process.

Please verify your personal information listed above and immediately notify the USCIS National Customer Service Center at the phone number listed below if there are any changes.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov.

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

USCIS Office Address:

USCIS
California Service Center
P.O. Box 30111
Laguna Niguel, CA 92607-0111

USCIS Customer Service Number:

(800)375-5283
ATTORNEY COPY



EXHIBIT E

Department of Homeland Security
U.S. Citizenship and Immigration Services

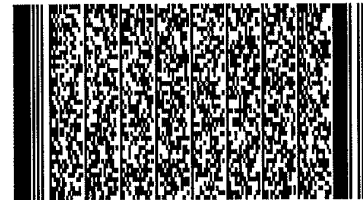
Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

ASC Appointment Notice	APPLICATION NUMBER WAC1390089377		NOTICE DATE 10/29/2012
	CASE TYPE I821D Consideration of Deferred Action for Childhood Arrivals	SOCIAL SECURITY NUMBER	USCIS A# [REDACTED]
		TCR	SERVICE CENTER WSC
			PAGE 1 of 1

SAUL JIMENEZ
c/o ARMADO VILLEGAS ESQ
12518 BEVERLY BLVD
WHITTIER, CA 90601

BIOMETRICS PROCESSING STAMP
SITE CODE:
BIOMETRICS QA REVIEW BY: NOV 26 2012
ON
FINGERPRINTS QA REVIEW BY: NOV 26 2012
ON



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.
PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER AT THE DATE AND TIME SPECIFIED.
IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.

APPLICATION SUPPORT CENTER
USCIS EL MONTE
9251 GARVEY AVE
GOLDEN VISTA PLAZA, UNIT Q
SO. EL MONTE, CA 91733

PLEASE READ THIS ENTIRE NOTICE CAREFULLY.

DATE AND TIME OF APPOINTMENT
11/26/2012
8:00 AM

WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:
1. THIS APPOINTMENT NOTICE and
2. PHOTO IDENTIFICATION. Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.

REQUEST FOR RESCHEDULING

Please reschedule my appointment. Upon receipt of your request, you will be provided a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

APPLICATION NUMBER
I821D - WAC1390089377



If you have any questions regarding this notice, please call 1-800-375-5283.

WARNING: Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

Please see the back of this notice for important information.

Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TDD: 1-800-767-1833) to request an accommodation.

Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS. For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

Note: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form *N-648, Medical Certification for Disability Exceptions* to request an exception. See the form instructions for additional information.

EXHIBIT F

OMB No. 1615-0040; Expires 02/28/2013

Department of Homeland Security
U.S. Citizenship and Immigration Services

**I-765, Application For
Employment Authorization**

Do not write in this block.

Remarks	Action Block	Fee Stamp
A#		
Applicant is filing under §274a.12 _____		
<input type="checkbox"/> Application Approved. Employment Authorized / Extended (Circle One) until _____ (Date). Subject to the following conditions: _____ (Date). Application Denied. <input type="checkbox"/> Failed to establish eligibility under 8 CFR 274a.12 (a) or (c). <input type="checkbox"/> Failed to establish economic necessity under 8 CFR 274a.12(c)(14), (18) and 8 CFR 214.2(f).		

I am applying for: Permission to accept employment.
 Replacement (of lost employment authorization document).
 Renewal of my permission to accept employment (attach previous employment authorization document).

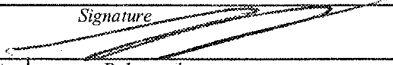
1. Name (Family Name in CAPS) (First)	(Middle)	Which USCIS Office?	Date(s)
JIMENEZ	SAUL	N/A	
2. Other Names Used (include Maiden Name)			
SUAREZ JIMENEZ, SAUL			
3. Address in the United States (Street Number and Name) (Apt. Number)			
[REDACTED]			
(Town or City)		(State/Country)	(ZIP Code)
[REDACTED]		[REDACTED]	[REDACTED]
4. Country of Citizenship/Nationality			
MEXICO			
5. Place of Birth (Town or City)		(State/Province)	(Country)
TECOMAN, COLIMA, MEXICO			
6. Date of Birth (mm/dd/yyyy)	7. Gender		
[REDACTED]	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		
8. Marital Status	<input type="checkbox"/> Married <input checked="" type="checkbox"/> Single <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced		
9. Social Security Number (include all numbers you have ever used) (if any)			
N/A			
10. Alien Registration Number (A-Number) or I-94 Number (if any)			
N/A			
11. Have you ever before applied for employment authorization from USCIS?			
<input type="checkbox"/> Yes (If "Yes," complete below) <input checked="" type="checkbox"/> No			
12. Date of Last Entry into the U.S. (mm/dd/yyyy)			
07/08/1988			
13. Place of Last Entry into the U.S.			
TIJUANA, MEXICO			
14. Manner of Last Entry (Visitor, Student, etc.)			
EWI			
15. Current Immigration Status (Visitor, Student, etc.)			
DEFERRED ACTION			
16. Go to the "Who May File Form I-765?" section of the instructions. In the space below, place the letter and number of the eligibility category you selected from the instructions. (For example, (a)(8), (c)(17)(iii), etc.).			
(C) (33) ()			
17. If you entered the eligibility category, (c)(3)(C), in Question 16 above, list your degree, your employer's name as listed in E-Verify, and your employer's E-Verify Company Identification Number or a valid E-Verify Client Company Identification Number in the space below.			
Degree: _____			
Employer's Name as listed in E-Verify: _____			
Employer's E-Verify Company Identification Number or a valid E-Verify Client Company Identification Number: _____			

Certification

Your Certification: I certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct. Furthermore, I authorize the release of any information that U.S. Citizenship and Immigration Services needs to determine eligibility for the benefit I am seeking. I have read the "Who May File Form I-765?" section of the instructions and have identified the appropriate eligibility category in **Question 16**.

Signature:  Telephone Number: [REDACTED] Date: 10/16/2012

Signature of Person Preparing Form, If Other Than Above: I declare that this document was prepared by me at the request of the applicant and is based on all information of which I have any knowledge.

Print Name	Address	Signature	Date	
ARMANDO VILLEGAS, ESQ.	12518 BEVERLY BLVD		10/17/2012	
Remarks	Initial Receipt	Resubmitted	Relocated	Completed
			Received Sent Approved	Denied Returned



Form I-765 08/15/12 Y

EXHIBIT G



Form I-765 Worksheet
 Department of Homeland Security
 U.S. Citizenship and Immigration Services

USCIS
Form I-765WS
 OMB No. 1615-0040
 Expires 02/28/2013

If you are applying for employment authorization under the (c)(14), Deferred Action, or (c)(33), Consideration of Deferred Action for Childhood Arrivals, eligibility categories, complete this worksheet to establish your economic need for employment pursuant to 8 CFR § 274a.12(e). It is not necessary to submit supporting documentation, though it will be accepted and reviewed if you choose to submit it.

Part 1. Full Name

1.a. Family Name (Last Name)

1.b. Given Name (First Name)

1.c. Middle Name

Part 2. Financial Information

2. My current annual income is: \$

3. My current annual expenses are: \$

4. The current value of my assets is: \$

Part 3. Additional Information

If you would like to provide an explanation of the above information, please use the space below.

DUE TO MY CURRENT STATUS AS AN ILLEGAL IMMIGRANT, I HAVE ENCOUNTERED AN EXTREMELY DIFFICULT TIME OBTAININ EMPLOYMENT. NOT ONLY IS IT CRUCIAL FOR ME TO BE ABLE TO PROVIDE FOR MYSELF BUT I NEED TO BE ABLE TO PROVIDE FOR MY PARENTS AS WELL. AS A 25 YEAR OLD COLLEGE GRADUATE IT IS IMPORTANT FOR ME TO BE ABLE TO FOCUS ON MY CAREER IN PHYSICAL EDUCATION. I WOULD LIKE TO ONE DAY OWN A HOME, FINISH PAYING MY STUDENT LOANS AND MOST IMPORTANTLY, AID MY PARENTS ECONOMICALLY. IT IS MY DESIREE TO BE ABLE TO WORK WITHIN MY OWN FIELD AND STRIVE TO ACQUIRE THE AMERICAN DREAM.

EXHIBIT H

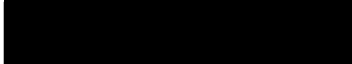
Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE October 25, 2012
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER WAC1390089377	RECEIVED DATE October 22, 2012	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

SAUL JIMENEZ



1 263



NAME AND MAILING ADDRESS

PAYMENT INFORMATION:

Application/Petition Fee: \$465.00
Biometrics Fee: \$0.00
Total Amount Received: \$465.00
Total Balance Due: \$0.00

Full and complete payment has been received on the above application. **Please notify us immediately if any of the above information is incorrect.** If you find it necessary to contact this office in writing, you must include a copy of this receipt notice with your inquiry.

BIOMETRICS -

The next step is to have your biometrics taken at a USCIS Application Support Center (ASC). You will receive a notice in the mail regarding when USCIS has scheduled you for your ASC appointment.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov.

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

USCIS Office Address:

USCIS
California Service Center
P.O. Box 30111
Laguna Niguel, CA 92607-0111

USCIS Customer Service Number:

(800)375-5283



EXHIBIT I

Department of Homeland Security
U.S. Citizenship and Immigration Service

I-797, Notice of Action



RECEIPT NUMBER WAC-13-900-89376		CASE TYPE I821 /I-821D	
RECEIPT DATE October 24, 2012	PRIORITY DATE	APPLICANT [REDACTED] JIMENEZ, SAUL	
NOTICE DATE January 30, 2013	PAGE 1 of 1		
ARMANDO VILLEGAS 12518 BEVERLY BLVD WHITTIER CA 90601		Notice Type: Approval Notice Valid from 01/30/2013 to 01/29/2015	

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. If granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at www.uscis.gov. There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC
CALIFORNIA SERVICE CENTER
P. O. BOX 30111
LAGUNA NIGUEL CA 92607-0111
Customer Service Telephone: (800) 375-5283



EXHIBIT J

Department of Homeland Security
U.S. Citizenship and Immigration Services

I-797, Notice of Action



RECEIPT NUMBER WAC-13-900-89377		CASE TYPE I765 APPLICATION FOR EMPLOYMENT AUTHORIZATION	
RECEIPT DATE October 24, 2012	PRIORITY DATE	APPLICANT [REDACTED] JIMENEZ SUAREZ, SAUL	
NOTICE DATE January 30, 2013	PAGE 1 of 1		
SAUL JIMENEZ SUAREZ [REDACTED]		Notice Type: Approval Notice Class: C33 Valid from 01/30/2013 to 01/29/2015	

This courtesy notice is to advise you of action taken on this case. The official notice has been mailed to the authorized representative. Any relevant documentation included in the notice was also mailed as part of the official notice.

Your application for employment authorization has been approved. The Form I-766, Employment Authorization Document, was sent under separate cover to the beneficiary.

This card authorizes your employment in the United States. Show this card to your employer to verify authorization to work during the dates on the card.

If any information on the card is incorrect, please write the office listed below. Include your Employment Authorization Document, I-766, a photocopy of this notice, and evidence to support the necessary corrections.

THIS APPROVAL NOTICE IS NOT A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZATION, NOR MAY IT BE USED IN PLACE OF A VISA OR FORM I-766.

As a reminder, you may request to change employers under INA 204(j) if your Form I-485 Adjustment application has been pending for at least 180 days and your underlying Form I-140 is approved or is still pending. In order to do so, you should supplement the Form I-485 record of proceeding with documentation relating to the new job offer that forms the basis of the INA 204(j) portability request. For more information on how to request to change employers and what information is required to supplement the Form I-485, please visit www.uscis.gov.

This courtesy copy may not be used in lieu of official notification to demonstrate the filing or processing action taken on this case.

THIS FORM IS NOT A VISA NOR MAY IT BE USED IN PLACE OF A VISA.

NOTICE: Although this application/petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify the information submitted in this application, petition and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of verification will be used to determine whether revocation, rescission, and/or removal proceedings are appropriate. Applicants, petitioners, and representatives of record will be provided an opportunity to address derogatory information before any formal proceeding is initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC

CALIFORNIA SERVICE CENTER

P. O. BOX 30111

LAGUNA NIGUEL CA 92607-0111

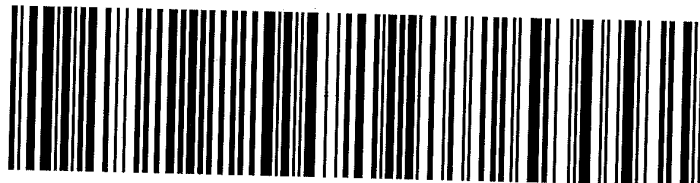
Customer Service Telephone: (800) 375-5283



EXHIBIT K

P.O. Box 10765
Laguna Niguel, CA 92607-1076

ZIP – USPS DELIVERY CONFIRMATION



420 90023 0000 9205 5923 3840 0193 6196 94

USCIS National Customer Service Center
1-800-375-5283

JIMENEZ SUAREZ, SAUL



Date 1/31/2013

IMPORTANT INFORMATION – SAVE THIS MAILER

Use this section to speed your application for an extension or replacement card.

A#



JIMENEZ SUAREZ, SAUL



RECEIPT # WAC1390089377



* W A C 1 3 9 0 0 8 9 3 7 7 *



* 1 A 0 6 1 2 2 1 7 3 8 8 4 4 *

CARD #



* 1 A 0 6 1 2 2 1 7 3 8 8 4 4 *

Help USCIS Serve You Better

We recommend you keep this notice in a safe place for your future reference. It shows your USCIS "A" or "N" number, which is your USCIS account and file number, and it also has other important information.

The tear-off portion of this mailer can also help speed your later application for another card. When you file for another card, we recommend you attach the tear-off portion to your completed application.



U.S. Citizenship and Immigration Services

Your Application Has Been Approved.

Here is your new card. The expiration date is shown on the front.

Please Check Your Card To Verify That the Information Is Correct.

If you find an error on it, please call us at the telephone number provided below.

Please Protect Your Card.

Please Read This Notice.

It has important information. We also recommend that you keep this notice for your records.

If you ever have questions about immigration benefits and procedures, or wish to have an application mailed to you, please call our USCIS National Customer Service Center at **1-800-375-5283**, or Check our website at <http://www.uscis.gov>.

USCIS has a guide for new Permanent Residents called *Welcome to the United States: A Guide for New Immigrants*. It has important information about your rights and responsibilities. The guide is available in English and 13 other languages at <http://www.uscis.gov/newimmigrants>

Additional Information About Your Card

USCIS issues several kinds of cards for different purposes. Please read how to use your card. Always carry your card in the United States and show it when you re-enter the United States. Please keep this information for your future reference.

Permanent Resident Card

Your card has an expiration date.

- If you are a conditional resident, you should apply to remove the conditions 90 days before your card expires.
- If you are a permanent resident, the expiration date does not affect your status, but you should use form I-90 to apply for a new card 90 days before this card expires.

As a resident you should be aware of other immigration services:

- If your card is lost, stolen, or becomes damaged, or your name or other information shown on your card changes, use Form I-90 to apply for a new card.
- If you are going to travel and believe you may be gone a year or more, you should apply for a reentry permit *before you leave* - see Form I-131 for information.
- You can sponsor the immigration of certain relatives - see Form I-130 for information.
- Permanent residents can become American citizens. Usually, you have to be a permanent resident for 5 years, but in some circumstances you can apply earlier - see Form N-400 for information.

Employment Authorization Card and Advance Parole Card

You are authorized to work consistent with any conditions shown on the card until it expires.

- If you apply for a job, you may show your card to the employer to show you are authorized to work while the card is *valid*.
- If you are already employed and this card extends your employment authorization, you may show this new card to your employer to show that your work authorization has been extended.

Your EAD card is also evidence of your status. Please see the enclosed important advisory.

Replacement Citizen Card

Use your card as evidence of your U.S. Citizenship.

(This replacement card is only issued to certain American Indians and persons from the Northern Mariana Islands who were previously issued this kind of card.) You do not need to carry your card while in the United States.

Student/Exchange Visitor Card

Use your card to show that you are a valid F, J, or M nonimmigrant student, exchange visitor, or dependent. This card does not grant employment authorization. To apply for employment authorization, use Form I-765.



**U.S. Citizenship
and Immigration
Services**

Enclosed is your new employment authorization card. This card is valid until the date specified on the card. If the card expires before U.S. Citizenship and Immigration Services (USCIS) makes a final decision on your Form I-485, *Application for Adjustment of Status*, you may apply for a new card. Please refer to instructions at www.uscis.gov. If any information on this card is missing or incorrect, please call our USCIS National Customer Service Center at 1-800-375-5283, or check our website at <http://www.uscis.gov>.

Evidence of Employment Authorization—Any time before the expiration date shown on the enclosed card you may present the card to any employer as evidence that you are authorized to accept employment (as permitted under 8 CFR 274a.2(b)(1)(v)(A)(4)).

Special Advisory Regarding Combination Employment Authorization/Advance Parole Card

Most employment authorization cards contain the statement, "NOT VALID FOR REENTRY TO U.S." near the bottom of the card, just above the validity date. However, if you have received a card that instead contains the statement, "SERVES AS I-512 ADVANCE PAROLE," you have received a Combination Employment Authorization/Advance Parole Card. We call it a "combo card." The combo card permits you to work in the United States and to travel outside the United States and return while your Form I-485 is pending with USCIS.

Evidence of Advance Parole—A combo card is also evidence that, while your Form I-485 remains pending, you may travel abroad without abandoning your Form I-485 application (as permitted under 8 CFR 245.2(a)(4)(ii)(B)).

Presenting a valid combo card will authorize a transportation operator to accept you on board for travel to the United States without liability under section 273 of the Immigration and Nationality Act (the Act), provided that you arrive in the United States on or before the expiration date on the card. You may also present the combo card at a port of entry to seek parole into the United States. The card is valid for multiple applications for parole into the United States until the card expires. The period of parole will be determined at the port of entry.

**If you have received a combo card, please see important information on reverse before traveling outside the United States.
Parole upon your return to the United States is not guaranteed.**

www.uscis.gov

Form I-931 (03/16/09)

NOTICE: READ BEFORE YOU TRAVEL ABOARD

Parole Into the United States Is Not Guaranteed—In all cases, you are still subject to immigration inspection at a port of entry to determine whether you are eligible to return to the United States under the terms of this advance parole. If you travel outside the United States, you may use the combo card to seek parole upon your return. However, the fact that you have this combo card does not prevent the Department of Homeland Security (DHS), in the exercise of its discretion, from refusing to parole you into the United States if DHS determines that parole no longer serves the public interest of the United States.

Parole Into the United States Is Not an Admission—If your Form I-485 is denied, you may be subject to removal proceedings as an inadmissible alien under sections 212(a) and 235(b)(1) or 240 of the Act rather than as a deportable alien under sections 237(a) and 240 of the Act.

DHS reserves the authority, at any time, to revoke your advance parole, whether you are in the United States or aboard. If DHS revokes your advance parole, then you will no longer be authorized to use this combo card to board a plane, ship, or any other carrier for travel to the United States, nor will you be able to apply for parole at a port of entry with the combo card. If the Department of Homeland Security revokes your advance parole while you are outside the United States, your combo card will no longer be valid for travel. If the Department of Homeland Security revokes your advance parole, you may not be able to return to the United States, unless you are eligible for, and obtain, a visa or other valid travel document.

Inadmissibility in General—If you have concerns about how traveling abroad with the combo card may affect your legal rights, admissibility, or waivers, you should contact an immigration attorney or an immigrant assistance organization accredited by the Board of Immigration Appeals before making foreign travel plans.

A Reminder About Unlawful Presence—If you have been unlawfully in the United States, you should be aware of the following: Under the *Illegal Immigration Reform and Immigrant Responsibility Act of 1996*, aliens who depart the United States after being unlawfully present in the United States for certain periods may be barred from admission, even if they had previously obtained advance parole. After April 1997, if you were unlawfully present in the United States for more than 180 days, you may be found inadmissible under section 212(a)(9)(B)(i) of the Act when you return to the United States. If you were unlawfully present in the United States for more than 180 days but less than one year and departed voluntarily before the start of removal proceeding, you are inadmissible for three years; if you were unlawfully present for one year or more, you are inadmissible for 10 years.

www.uscis.gov

Form I-931 (03/16/09)

EXHIBIT L

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE November 05, 2014
CASE TYPE I-821D, Consideration of Deferred Action for Childhood Arrivals		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER LIN1590180448	RECEIVED DATE November 03, 2014	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

SAUL JIMENEZ SUAREZ
[REDACTED] 3 920
[Barcode]

NAME AND MAILING ADDRESS

The above case has been received by our office and is in process.

Please verify your personal information listed above and immediately notify the USCIS National Customer Service Center at the phone number listed below if there are any changes.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov.

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

<p>USCIS Office Address: USCIS Nebraska Service Center P.O. Box 82521 Lincoln, NE 68501-2521</p>	<p>USCIS Customer Service Number: (800)375-5283 </p>
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EXHIBIT M

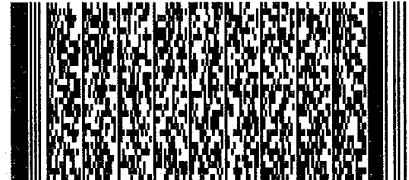
Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

ASC Appointment Notice	APPLICATION/PETITION/REQUEST NUMBER LIN1590180448 - LIN1590180449		NOTICE DATE 11/07/2014
CASE TYPE I821D - I765	SOCIAL SECURITY NUMBER	USCIS A#	CODE 3
ACCOUNT NUMBER	TCR	SERVICE CENTER NSC	PAGE 1 of 1

SAUL JIMENEZ SUAREZ



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.
**PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER AT THE DATE AND TIME SPECIFIED.
IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.**

APPLICATION SUPPORT CENTER
USCIS WILSHIRE
1015 WILSHIRE BOULEVARD 1ST FLOOR, SUITE 100
LOS ANGELES CA 90017

**PLEASE READ THIS ENTIRE NOTICE CAREFULLY.
DATE AND TIME OF APPOINTMENT**
11/25/2014
01:00PM

WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:
1. **THIS APPOINTMENT NOTICE** and
2. **PHOTO IDENTIFICATION.** Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.

REQUEST FOR RESCHEDULING

Please reschedule my appointment. Once USCIS receives your request, you will be sent a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

BIOMETRICS PROCESSING STAMP
ASC SITE CODE: 08248
BIOMETRICS QA REVIEW BY 26 2014
ON
TENPRINTS QA REVIEW BY 912469
ON 11/25/2014

APPLICATION NUMBER
I821D - LIN1590180448



APPLICATION NUMBER 2
I765 - LIN1590180449



If you have any questions regarding this notice, please call 1-800-375-5283.

WARNING: Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

If you are visiting a field office and need directions, including public transportation directions, please see www.uscis.gov/fieldoffices for more information.

Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS. For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

NOTE: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

EXHIBIT N

OMB No. 1615-0040; Expires 04/30/2016

Department of Homeland Security
U.S. Citizenship and Immigration Services

**I-765, Application For
Employment Authorization**

Do not write in this block.

Remarks	Action Block	Fee Stamp
A#		
Applicant is filing under §274a.12 _____		
<input type="checkbox"/> Application Approved. Employment Authorized / Extended (Circle One) until _____ (Date). Subject to the following conditions: _____ (Date). Application Denied. <input type="checkbox"/> Failed to establish eligibility under 8 CFR 274a.12 (a) or (c). <input type="checkbox"/> Failed to establish economic necessity under 8 CFR 274a.12(c)(14), (18) and 8 CFR 214.2(f)		

I am applying for: Permission to accept employment.
 Replacement (of lost employment authorization document).
 Renewal of my permission to accept employment (attach previous employment authorization document).

1. Name (Family Name in CAPS) (First) (Middle) JIMENEZ SUAREZ Saul	Which USCIS Office? Laguna Niguel, CA	Date(s)
2. Other Names Used (include Maiden Name) JIMENEZ Saul	Results (Granted or Denied - attach all documentation) Granted by DACA	
3. U.S. Mailing Address (Street Number and Name) (Apt. Number) [Redacted]	12. Date of Last Entry into the U.S., on or about: (mm/dd/yyyy)	
(Town or City) (State/Country) (ZIP Code)	13. Place of Last Entry into the U.S. San Diego, CA	
4. Country of Citizenship/Nationality Mexico	14. Status at Last Entry (B-2 Visitor, F-1 Student, No Lawful Status, etc.) No Lawful Status	
5. Place of Birth (Town or City) (State/Province) (Country) Tecoman Colima Mexico	15. Current Immigration Status (Visitor, Student, etc.) DACA Recipient	
6. Date of Birth (mm/dd/yyyy) [Redacted]	16. Go to the "Who May File Form I-765?" section of the instructions. In the space below, place the letter and number of the eligibility category you selected from the instructions. (For example, (a)(8), (c)(17)(iii), etc.) (c) (33) ()	
7. Gender <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	17. If you entered the eligibility category, (c)(3)(C), in Question 16 above, list your degree, your employer's name as listed in E-Verify, and your employer's E-Verify Company Identification Number or a valid E-Verify Client Company Identification Number in the space below. Degree: _____ Employer's Name as listed in E-Verify: _____ Employer's E-Verify Company Identification Number or a valid E-Verify Client Company Identification Number: _____	
8. Marital Status <input type="checkbox"/> Married <input checked="" type="checkbox"/> Single <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced		
9. Social Security Number (Include all numbers you have ever used, if any)		
10. Alien Registration Number (A-Number) or I-94 Number (if any)		
11. Have you ever before applied for employment authorization from USCIS? <input checked="" type="checkbox"/> Yes (Complete the following questions.) <input type="checkbox"/> No (Proceed to Question 12.)		

Certification

Your Certification: I certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct. Furthermore, I authorize the release of any information that U.S. Citizenship and Immigration Services needs to determine eligibility for the benefit I am seeking. I have read the "Who May File Form I-765?" section of the instructions and have identified the appropriate eligibility category in Question 16.

Signature:  Telephone Number: [Redacted] Date: 10/11/2014

Signature of Person Preparing Form, If Other Than Above: I declare that this document was prepared by me at the request of the applicant and is based on all information of which I have any knowledge.

Print Name _____ Address _____ Signature _____ Date _____

Remarks	Initial Receipt	Resubmitted	Relocated			Completed		
			Received	Sent	Approved	Denied	Returned	

EXHIBIT O

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE November 05, 2014
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER LIN1590180449	RECEIVED DATE November 03, 2014	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

SAUL JIMENEZ SUAREZ
[REDACTED] 3 919

PAYMENT INFORMATION:

Application/Petition Fee: \$465.00
Biometrics Fee: \$0.00
Total Amount Received: \$465.00
Total Balance Due: \$0.00



NAME AND MAILING ADDRESS

Full and complete payment has been received on the above application. **Please notify us immediately if any of the above information is incorrect.** If you find it necessary to contact this office in writing, you must include a copy of this receipt notice with your inquiry.

BIOMETRICS -

The next step is to have your biometrics taken at a USCIS Application Support Center (ASC). You will receive a notice in the mail regarding when USCIS has scheduled you for your ASC appointment.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov.

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

USCIS Office Address:
USCIS
Nebraska Service Center
P.O. Box 82521
Lincoln, NE 68501-2521

USCIS Customer Service Number:
(800)375-5283



EXHIBIT P

Department of Homeland Security
U.S. Citizenship and Immigration Services

I-797, Notice of Action



RECEIPT NUMBER LIN-15-901-80448		CASE TYPE I821D CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS	
RECEIPT DATE November 4, 2014	PRIORITY DATE	APPLICANT [REDACTED]	
NOTICE DATE December 29, 2014	PAGE 1 of 1	JIMENEZ SUAREZ, SAUL	
SAUL JIMENEZ SUAREZ [REDACTED]		Notice Type: Approval Notice Valid from 12/24/2014 to 12/23/2017	

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at www.uscis.gov. There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

NEBRASKA SERVICE CENTER

U. S. CITIZENSHIP & IMMIG SERVICE

P.O. BOX 82521

LINCOLN NE 68501-2521

Customer Service Telephone: 800-375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

Additional Information

GENERAL.

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

INQUIRIES.

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

APPROVAL OF NONIMMIGRANT PETITION.

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

APPROVAL OF AN IMMIGRANT PETITION.

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

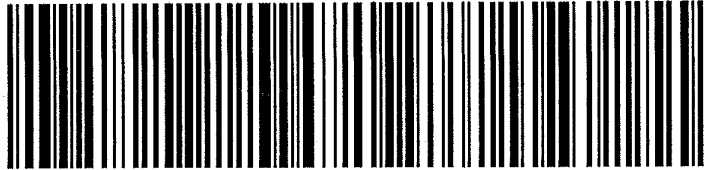
In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.

EXHIBIT Q

P.O. Box 82521
Lincoln, NE 68501-2521

ZIP – USPS DELIVERY CONFIRMATION



9205 5923 3840 0155 9974 02

USCIS National Customer Service Center
1-800-375-5283

JIMENEZ SUAREZ, SAUL



Date 12/31/2014

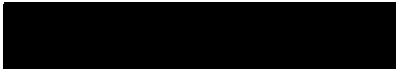
IMPORTANT INFORMATION – SAVE THIS NOTICE

Use this tear-off portion to speed your application for an extension or replacement card.

A#



JIMENEZ SUAREZ, SAUL



* 1 A 0 6 1 4 2 4 6 5 2 7 5 1 *

RECEIPT # LIN1590180449



* L I N 1 5 9 0 1 8 0 4 4 9 *

CARD # 1A061424652751



* 1 A 0 6 1 4 2 4 6 5 2 7 5 1 *

Help USCIS Serve You Better

We recommend that you keep this notice for your records. It has important information.

The tear-off portion of this notice can help speed your application for an extension or replacement card. When you file for another card, we recommend you attach the tear-off portion to your completed application.



**U.S. Citizenship
and Immigration
Services**

Please Read This Notice. It has important information. We also recommend that you keep this notice for your records.

Your Application Has Been Approved.

Here is your new card. The expiration date is shown on the front.

Please Check Your Card to Verify That the Information Is Correct.

If any information on this card is missing or incorrect, please call the National Customer Service Center at 1-800-375-5283 or check our Website at www.uscis.gov for instructions.

Please Protect Your Card.

Additional Information About Your Card

U.S. Citizenship and Immigration Services (USCIS) issues several kinds of cards for different purposes. Please read the information in this notice on how to use your card. If you are 18 years of age or older, you are required to carry your Employment Authorization Document or Permanent Resident Card or other proof of alien registration in the United States with you at all times so it is available when needed. If you received a Permanent Resident Card or Combination Employment Authorization and Advance Parole Card (combo card), you should take it with you when you travel outside the United States so you can show it to a Customs and Border Protection (CBP) Officer upon your return to a U.S. port of entry. If you forget to take your card or lose it while traveling outside the United States, contact the nearest U.S. Embassy or consulate for travel assistance.

Permanent Resident Card

Your card has an expiration date.

- If you are a conditional resident, you should apply to remove the conditions 90 days before your card expires.
- If you are a permanent resident, the expiration date does not affect your status, but you should use Form I-90, Application to Replace Permanent Resident Card, to apply for a new card as early as 6 months before your card expires.

As a permanent resident, you should be aware that:

- If your card is lost, stolen, or becomes damaged, or your name or other information shown on your card changes, use Form I-90 to apply for a new card.
- If you are going to travel and believe you may be outside of the United State for a year or more, you should apply for a reentry permit. You must be physically present in the United States when you file the reentry permit application and complete the biometrics services requirement. See Form I-131, Application for Travel Document, for information.
- You can sponsor the immigration of certain relatives. See Form I-130, Petition for Alien Relative, for information.
- Permanent residents can apply to become American citizens after a certain period of residence in the United States. Usually, you have to be a permanent resident for 5 years, but in some circumstances you can apply earlier. See Form M-476, A Guide to Naturalization, or visit the Citizenship Resource Center at www.uscis.gov/citizenship.

USCIS has a guide for new permanent residents called "Welcome to the United States: A Guide for New Immigrants." It has important information about your rights and responsibilities. The guide is available at www.uscis.gov/newimmigrants in English and a variety of languages.

Employment Authorization Document (EAD)

You are authorized to work consistent with any conditions shown on the card until it expires.

- If you apply for a job, you may show your card to the employer to show that you are authorized to work while the card is valid. Employers may accept the new card as a List A document when completing the Employment Eligibility Verification (Form I-9).
- If you are already employed and this card extends your employment authorization, you may show this new card to your employer to show that your work authorization has been extended.

Your EAD may also serve as evidence of your immigration status. In other cases, your EAD may show that you have a pending application for an immigration benefit that authorizes employment while the application is pending.

You may apply for a new EAD if your current card expires before USCIS makes a final decision on your: Form I-485, Application to Register Permanent Residence or Adjust Status; Form I-881, Application for Suspension of Deportation or Special Rule Cancellation of Removal; Form I-589, Application for Asylum and for Withholding of Removal; or other pending application that allows for employment while your application is pending. Please refer to the instructions for Form I-765, Application for Employment Authorization Document, at www.uscis.gov.

Combination Employment Authorization and Advance Parole Card

Your Combination Employment Authorization and Advance Parole Card (combo card) serves as both an employment authorization document and an advance parole document while your Form I-485 is pending with USCIS. See the information above relating to employment authorization.

Your combo card also allows you to seek parole into the United States upon returning from travel outside of the United States. You should take your combo card with you when you travel outside the United States so you can present it to a CBP Officer at a U.S. port of entry to seek parole upon your return. Please see the instructions for Form I-131 and the enclosed Form I-931, which provide important additional information about using an advance parole document for travel.

Questions

If you ever have questions about immigration benefits and procedures or wish to have an application mailed to you, please call our National Customer Service Center at 1-800-375-5283 or check our Website at www.uscis.gov.

Special Advisory Regarding a Combination Employment Authorization and Advance Parole Card

Most employment authorization cards contain the statement, "NOT VALID FOR REENTRY TO U.S." near the bottom of the card, just above the validity date. However, if you have received a card that instead contains the statement, "SERVES AS I-512 ADVANCE PAROLE," you have received a Combination Employment Authorization and Advance Parole Card (combo card). The combo card serves as both an employment authorization document and an advance parole document while your Form I-485, Application to Register Permanent Residence or Adjust Status, is pending with USCIS.

If you travel outside the United States, you may present, in addition to other documents, the combo card at a port of entry to seek parole upon your return.

In addition, U.S. immigration law requires passengers to present evidence of authorization to apply for admission or to otherwise seek lawful entry into the United States before they may board a vessel or aircraft destined for the United States. Presenting a valid combo card will authorize a transportation carrier to accept you on board for travel to the United States, provided that you return to the United States on or before the expiration date on the card.

The card is valid for multiple applications for parole into the United States until the expiration date.

If you have received a combo card, please see important information on the reverse side of this form before traveling outside of the United States. Parole upon your return to the United States is not guaranteed.



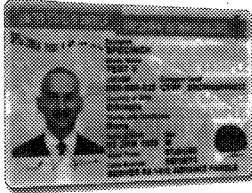
**U.S. Citizenship
and Immigration
Services**

www.uscis.gov

Form I-931 (Rev. 07/01/14) N

NOTICE: Read Before You Travel Abroad

If you travel outside the United States, you may use the combo card to seek parole upon your return. However, issuance of an advance parole document or the combo card is not a grant of parole nor does it guarantee that you will be paroled upon arrival at a port of entry. Instead, an advance parole document or combo card merely allows a transportation carrier to accept the document as proof that you will be allowed to seek parole upon your return to the United States. Therefore, the transportation carrier can accept you on board to travel to the United States without fear of penalty or fine for unlawfully bringing you into the United States.



In all cases, you are still subject to immigration inspection at a port of entry to determine whether you are eligible to return to the United States under the terms of this advance parole document. The fact that you have this combo card does not prevent the Department of Homeland Security (DHS), in the exercise of its discretion, from refusing to parole you into the United States if DHS determines that parole no longer serves the public interest of the United States.

Parole into the United States is not an admission. When you present an advance parole document at a port of entry, you are an applicant for admission. If you are paroled into the United States you still remain an applicant for admission, regardless of any status

you may have had before leaving the United States, and therefore you will continue to be subject to further inspection and to the inadmissibility grounds under section 212 of the Immigration and Nationality Act (INA).

DHS reserves the authority to revoke your advance parole document at any time, whether you are in the United States or abroad. If DHS revokes your advance parole document, then your combo card will no longer serve as evidence of authorization to apply for parole at a port of entry. If DHS revokes your advance parole document, you may not be able to return to the United States unless you are eligible for and obtain a visa or other valid travel document.

If DHS does parole you at a port of entry, DHS may also terminate or revoke your parole at any time. In the same way that you remain an applicant for admission during your parole, you will remain an applicant for admission if DHS revokes or terminates your parole or if your parole expires, regardless of any status you may have had before leaving the United States. Since you remain an applicant for admission even if DHS revokes or terminates your parole, you will continue to be subject to further inspection and to the inadmissibility grounds under section 212 of the INA.

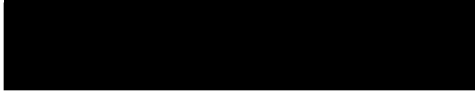
Inadmissibility in general. If you are concerned that traveling abroad may affect your admissibility, you may want to consult an immigration attorney or an organization accredited by the Board of Immigration Appeals before making any travel plans.

EXHIBIT R

Social Security Administration Important Information

Social Security Administration
SOCIAL SECURITY
215 N SOTO STREET
LOS ANGELES, CA 90033-2914
Date: May 12, 2015

SAUL JIMENEZ SUAREZ



This is a receipt to show that you applied for a Social Security card on May 12, 2015. You should have your card in about 2 weeks. Any document(s) you have submitted are being returned to you with this receipt.

You can use your Social Security card for work only if you have authorization from the Department of Homeland Security.

If you do not receive your Social Security card within 2 weeks, please let us know. You may call, write or visit any Social Security office. If you visit an office, please bring this receipt with you. To protect your privacy, we will not disclose a Social Security number over the telephone.

The Social Security Administration is required by law to limit replacement Social Security cards to three per year and ten per lifetime. Do not carry your Social Security card with you. Keep it in a safe location, not in your wallet.

Field Office Manager

BOYLE HEIGHTS CALIFORNIA
M. CAMPBELL
MAY 12 2015
91904
SSA FIELD OFFICE

EXHIBIT S

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE August 07, 2017
CASE TYPE I-821D, Consideration of Deferred Action for Childhood Arrivals		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER IOE0902816084	RECEIVED DATE August 03, 2017	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

SAUL JIMENEZ SUAREZ



NAME AND MAILING ADDRESS

The above case has been received by our office and is in process. Please verify your personal information listed above and immediately notify the USCIS National Customer Service Center at the phone number listed below if there are any changes.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov.

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

USCIS Office Address:
USCIS
Nebraska Service Center
P.O. Box 82521
Lincoln, NE 68501-2521

USCIS Customer Service Number:
(800)375-5283



If you are visiting a field office and need directions, including public transportation directions, please see www.uscis.gov/fieldoffices for more information.

Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS. For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

NOTE: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

EXHIBIT T

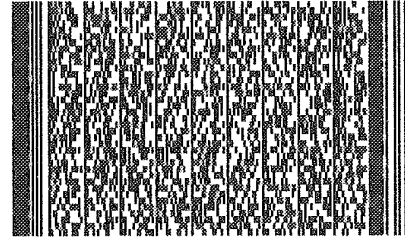
Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

ASC Appointment Notice	APPLICATION/PETITION/REQUEST NUMBER IOE0902816084 - IOE0902816085		NOTICE DATE 08/12/2017
CASE TYPE I821D - I765	SOCIAL SECURITY NUMBER	USCIS A#	CODE 5
ACCOUNT NUMBER	TCR	SERVICE CENTER NSC	PAGE 1 of 1

SAUL JIMENEZ SUAREZ



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.
**PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER (ASC) AT THE DATE AND TIME SPECIFIED.
IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.**

APPLICATION SUPPORT CENTER
USCIS WILSHIRE
1015 Wilshire Blvd 1st Fl, Suite 100
Los Angeles CA 90017

**PLEASE READ THIS ENTIRE NOTICE CAREFULLY.
DATE AND TIME OF APPOINTMENT**
09/01/2017
02:00PM

WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:

- 1. THIS APPOINTMENT NOTICE** and
- 2. PHOTO IDENTIFICATION.** Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.

NOTE: If the USCIS ASC is closed due to inclement weather or for other unforeseen circumstances, USCIS will automatically reschedule your appointment for the next available appointment date and mail you a notice with the new date and time.

REQUEST FOR RESCHEDULING

Please reschedule my appointment. Once USCIS receives your request, you will be sent a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

BIOMETRICS PROCESSING STAMP

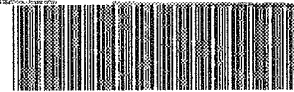
912616

SEP 01 2017

912616

APPLICATION NUMBER 2017
1765 - IOE0902816085

APPLICATION NUMBER
I821D - IOE0902816084



If you have any questions regarding this notice, please call 1-800-375-5283.

WARNING: Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

If you are visiting a field office and need directions, including public transportation directions, please see www.uscis.gov/fieldoffices for more information.

Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS. For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your **ONLY** need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

NOTE: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

EXHIBIT U



I-797 | NOTICE OF ACTION | DEPARTMENT OF HOMELAND SECURITY
U.S. CITIZENSHIP AND IMMIGRATION SERVICES

Receipt Number IOE0902816084	USCIS Account Number [REDACTED]	Case Type I821D - CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS
Received Date 08/04/2017	Priority Date 08/02/2017	Requestor [REDACTED] SAUL JIMENEZ SUAREZ
Notice Date 09/08/2017	Page 1 of 1	

JIMENEZ SUAREZ, SAUL
[REDACTED]

Notice Type: Approval Notice
Valid from: 09/08/2017 to 09/07/2019

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This notice does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at www.uscis.gov. There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

Nebraska Service Center
U. S. CITIZENSHIP & IMMIGRATION SVC
P.O. Box 82521
Lincoln NE 68501-2521



Customer Service Telephone: 800-375-5283

ADDITIONAL INFORMATION FOR APPLICANT/PETITIONER

Please save this Form I-797, Notice of Action (approval notice) for your records. Please note that simply filing an application, petition or request, or having an approved petition does not give the person it was filed for (also known as the beneficiary) permission to legally enter the United States. It also does not grant any legal immigration status.

Include a copy of this notice if you:

- Write to USCIS or a U.S. Consulate about your case or
- File another application or petition with USCIS based on this decision.

USCIS will notify you separately about any other applications or petitions you have filed.

Inquiries

If you have questions about your application or petition, you may:

- Go to <https://egov.uscis.gov/casestatus> to check your case status online.
- Call the National Customer Service Center at 1-800-375-5283.
- Telecommunications Device for the Deaf (TDD): 1-800-767-1833.
- Send us a letter and include a copy of this notice.
- Schedule an appointment at a local USCIS office using InfoPass at <https://infopass.uscis.gov>.

If you filed Form I-907, Request for Premium Processing Service, and you have any questions about your application or petition, please follow the instructions for contacting the Premium Processing Unit printed on the receipt notice we mailed you.

APPROVAL OF A NONIMMIGRANT PETITION

If we approved a nonimmigrant petition, it means that the beneficiary is eligible for the requested nonimmigrant classification. If this notice says that we are notifying a U.S. Consulate about the approval for the purpose of issuing a visa, contact the appropriate U.S. Consulate directly if you or the beneficiary has questions about the process.

APPROVAL OF AN IMMIGRANT PETITION

An approved immigrant petition does not grant any legal immigration status or guarantee that the beneficiary will receive a visa or an adjustment of status. The approved petition means the beneficiary can:

- Apply for an immigrant or fiancé(e) visa if he or she is outside the United States, or
- Apply for adjustment of status as a permanent resident if he or she is already in the United States.

If this notice states we approved your immigrant petition and forwarded it to the National Visa Center (NVC), the NVC will directly contact the beneficiary with information about how to apply for a visa. If any changes occur that could affect visa eligibility, visit the NVC website at <http://nvc.state.gov/ask> to find contact information and a public inquiry form.

For more information about obtaining Lawful Permanent Residence status and a Green Card, visit our website at www.uscis.gov.

EXHIBIT V

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE August 07, 2017
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER IOE0902816085	RECEIVED DATE August 03, 2017	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

SAUL JIMENEZ SUAREZ
[REDACTED]



PAYMENT INFORMATION:

Application/Petition Fee: \$495.00
Biometrics Fee: \$0.00
Total Amount Received: \$495.00
Total Balance Due: \$0.00

NAME AND MAILING ADDRESS

Eligibility Category: C33

The above application/petition has been received by our office and is in process. Please verify your personal information listed above and immediately notify the USCIS National Customer Service Center at the phone number listed below if there are any changes. Please note that if a priority date is printed on this notice, the priority does not reflect earlier retained priority dates.

Next Steps:

- USCIS will schedule a biometrics appointment for you to have your biometrics electronically captured at a USCIS Application Support Center (ASC). You will be receiving a biometrics appointment notice by mail with the specific date, time, and place where you will have your fingerprints and/or photographs taken.
- You must wait to receive your biometrics appointment notice before going to the ASC for biometrics processing.
- This notice does not serve as your biometrics appointment notice.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov. If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

This notice, by itself, does not grant any immigration status or benefit, nor is it evidence that this case is still pending. However, if:

- You have timely filed to renew your current Form I-766 Employment Authorization Document (EAD); **and**
- Your EAD renewal is under a category that is eligible for an automatic 180-day extension (see www.uscis.gov/I-765 for a list of categories); **and**
- The Category on your current EAD matches the "Class Requested" listed on this Notice of Action; (Note: If you are a TPS beneficiary or applicant, your EAD and this Notice must contain either the A12 or C19 class, but they do not need to match each other.); **and**
- You do not receive your renewal EAD before your current EAD expires,,
- **then** this Notice of Action automatically extends the validity of your EAD for up to 180 days from the expiration date printed on the face of the card. If all of the above conditions apply with respect to your EAD renewal application, you may present this Notice of Action with your expired EAD to your employer for employment eligibility verification (Form I-9) purposes. If your renewal application is denied, the automatic extension immediately terminates, and you may not provide this Notice of Action with your expired EAD for Form I-9 purposes. If your EAD is a combo card, the automatic extension does not apply to advance parole. For more information, please visit our website at www.uscis.gov/I-765.

USCIS Office Address:
USCIS
Nebraska Service Center
P.O. Box 82521
Lincoln, NE 68501-2521

USCIS Customer Service Number:
(800)375-5283



If you are visiting a field office and need directions, including public transportation directions, please see www.uscis.gov/fieldoffices for more information.

Notice for Customers with Disabilities

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TTY: 1-800-767-1833) to request an accommodation.

Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS. For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

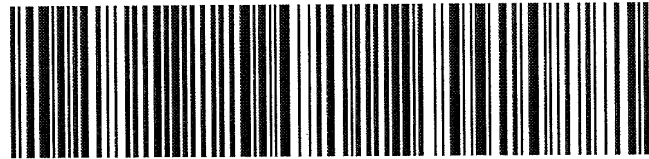
NOTICE: All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your ONLY need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

NOTE: Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form N-648, Medical Certification for Disability Exceptions to request an exception. See the form instructions for additional information.

EXHIBIT W

7 Product Way
Lees Summit, MO 64002

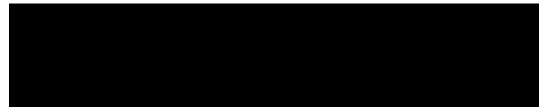
USPS Tracking # eVS



9205 5901 5370 8495 2887 07

USCIS National Customer Service Center
1-800-375-5283

JIMENEZ SUAREZ, SAUL



Date 9/13/2017

IMPORTANT INFORMATION – SAVE THIS NOTICE

Use this tear-off portion to speed your application for an extension or replacement card.

A# [REDACTED]

JIMENEZ SUAREZ, SAUL

[REDACTED]



RECEIPT # IOE0902816085



* I O E 0 9 0 2 8 1 6 0 8 5 *

CARD # [REDACTED]



* 1 A 0 7 1 7 3 0 6 3 4 0 5 3 *

Help USCIS Serve You Better

We recommend that you keep this notice for your records. It has important information.

The tear-off portion of this notice can help speed your application for an extension or replacement card. When you file for another card, we recommend you attach the tear-off portion to your completed application.

Please Read This Notice. It has important information. We also recommend that you keep this notice for your records.

Your Application Has Been Approved.

Here is your new card. The expiration date is shown on the front.

Please Check Your Card to Verify That the Information Is Correct.

If any information on this card is missing or incorrect, please call the National Customer Service Center at 1-800-375-5283 or check our Website at www.uscis.gov for instructions.

Please Protect Your Card.

Additional Information About Your Card

U.S. Citizenship and Immigration Services (USCIS) issues several kinds of cards for different purposes. Please read the information in this notice on how to use your card. If you are 18 years of age or older, you are required to carry your Employment Authorization Document or Permanent Resident Card or other proof of alien registration in the United States with you at all times so it is available when needed. If you received a Permanent Resident Card or Combination Employment Authorization and Advance Parole Card (combo card), you should take it with you when you travel outside the United States so you can show it to a Customs and Border Protection (CBP) Officer upon your return to a U.S. port of entry. If you forget to take your card or lose it while traveling outside the United States, contact the nearest U.S. Embassy or consulate for travel assistance.

Permanent Resident Card

Your card has an expiration date.

- If you are a conditional resident, you should apply to remove the conditions 90 days before your card expires.
- If you are a permanent resident, the expiration date does not affect your status, but you should use Form I-90, Application to Replace Permanent Resident Card, to apply for a new card as early as 6 months before your card expires.

As a permanent resident, you should be aware that:

- If your card is lost, stolen, or becomes damaged, or your name or other information shown on your card changes, use Form I-90 to apply for a new card.
- If you are going to travel and believe you may be outside of the United State for a year or more, you should apply for a reentry permit. You must be physically present in the United States when you file the reentry permit application and complete the biometrics services requirement. See Form I-131, Application for Travel Document, for information.



**U.S. Citizenship
and Immigration
Services**

- You can sponsor the immigration of certain relatives. See Form I-130, Petition for Alien Relative, for information.
- Permanent residents can apply to become American citizens after a certain period of residence in the United States. Usually, you have to be a permanent resident for 5 years, but in some circumstances you can apply earlier. See Form M-476, A Guide to Naturalization, or visit the Citizenship Resource Center at www.uscis.gov/citizenship.

USCIS has a guide for new permanent residents called “Welcome to the United States: A Guide for New Immigrants.” It has important information about your rights and responsibilities. The guide is available at www.uscis.gov/newimmigrants in English and a variety of languages.

Employment Authorization Document (EAD)

You are authorized to work consistent with any conditions shown on the card until it expires.

- If you apply for a job, you may show your card to the employer to show that you are authorized to work while the card is valid. Employers may accept the new card as a List A document when completing the Employment Eligibility Verification (Form I-9).
- If you are already employed and this card extends your employment authorization, you may show this new card to your employer to show that your work authorization has been extended.

Your EAD may also serve as evidence of your immigration status. In other cases, your EAD may show that you have a pending application for an immigration benefit that authorizes employment while the application is pending.

You may apply for a new EAD if your current card expires before USCIS makes a final decision on your: Form I-485, Application to Register Permanent Residence or Adjust Status; Form I-881, Application for Suspension of Deportation or Special Rule Cancellation of Removal; Form I-589, Application for Asylum and for Withholding of Removal; or other pending application that allows for employment while your application is pending. Please refer to the instructions for Form I-765, Application for Employment Authorization Document, at www.uscis.gov.

Combination Employment Authorization and Advance Parole Card

Your Combination Employment Authorization and Advance Parole Card (combo card) serves as both an employment authorization document and an advance parole document while your Form I-485 is pending with USCIS. See the information above relating to employment authorization.

Your combo card also allows you to seek parole into the United States upon returning from travel outside of the United States. You should take your combo card with you when you travel outside the United States so you can present it to a CBP Officer at a U.S. port of entry to seek parole upon your return. Please see the instructions for Form I-131 and the enclosed Form I-931, which provide important additional information about using an advance parole document for travel.

Questions

If you ever have questions about immigration benefits and procedures or wish to have an application mailed to you, please call our National Customer Service Center at **1-800-375-5283** or check our Website at www.uscis.gov.

EXHIBIT 45

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavidsn@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
9 ETHAN D. DETTMER (SBN 196046)
10 JESSE S. GABRIEL (SBN 263137)
11 GIBSON, DUNN & CRUTCHER LLP
12 333 South Grand Avenue
13 Los Angeles, CA 90071-3197
14 Telephone: (213) 229-7000
15 Facsimile: (213) 229-7520
16 Email: tboutrous@gibsondunn.com,
17 edettmer@gibsondunn.com,
18 jgabriel@gibsondunn.com
19 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
20 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
21 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
22 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
22 CALIFORNIA and JANET NAPOLITANO,
23 in her official capacity as President of the
24 University of California,

25 Plaintiffs,

26 v.

27 U.S. DEPARTMENT OF HOMELAND
28 SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF BRADFORD S. JONES

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, BRADFORD S. JONES, DECLARE:

2 1. I am a Professor at the University of California, Davis. The matters set forth herein are
3 true and correct of my own personal knowledge and, if called as a witness, I could and would testify
4 competently thereto.

5 2. I have been teaching political science at the university level for 23 years. My work
6 includes teaching classes focused on Latino studies, and researching issues facing Latino communities,
7 such as how Latinos perceive and cope with discrimination.

8 3. I have had DACA recipients, including Doe, as students and as research assistants.

9 4. As a professor, I observe firsthand the ways DACA students add to the classroom
10 environment. Doe was in my class on Latino Politics, which covers immigration policy, Latino political
11 behavior, and Latino public opinion. Doe earned an A grade and distinguished herself as a bright
12 student. She spoke frequently in class and provided insight that improved her classmates' educational
13 experience. In that class, 80-85% of my students are Latino, and one of the learning objectives is to
14 expose individuals to the different experiences that exist within the Latino community. I am third-
15 generation Mexican American, some of my students are American citizens born to immigrant parents,
16 and some, like Doe, are undocumented immigrants—either with or without DACA status. We each have
17 different experiences being Latino in America. Given her unique experience, Doe was able to reveal to
18 me and my other students what the undocumented experience is like. Without her voice or the voice of
19 other DACA students, we get only part of the picture in our class discussions.

20 5. DACA students are also invaluable to my research. My current research focuses on the
21 increased anxiety of different Latino communities in response to the Trump Administration's proposed
22 immigration policies. For example, in one recent survey, I showed randomized groups of respondents
23 images of Trump and bullet points summarizing his immigration policy. The survey results indicated a
24 statistically significant increase in anxiety among Latinos after mere exposure to these images. The
25 results show that Latino individuals everywhere live in a state of anxiety, but anxiety increases the
26 closer the person is to immigration—if the respondent is an immigrant or is personally close to an
27 immigrant, then they will feel more anxiety each time they are exposed to these triggers.

28

1 6. In conducting this research, I regularly need to distribute surveys. I often use a method
2 called “snowball” surveying: I start the surveys by “seeding” surveys within my personal network, in
3 which volunteers fill out the survey, and then those volunteers distribute it among their own social
4 networks.

5 7. My DACA and undocumented students are essential to this method of surveying. In the
6 immigrant communities I study, trust is the most essential factor in encouraging survey responses. My
7 DACA and undocumented students are trusted members of their communities. This is what enables
8 them to distribute surveys, encourage responses, and reassure respondents that their information will be
9 anonymous and never misused.

10 8. The result is that my trusted network of DACA students, including Doe, directly improve
11 the response rates of my research surveys. For example, in my recent survey that Doe and other
12 undocumented and DACA students assisted with distributing, the response rate was about 20% among
13 Latino immigrants (who self-identified as immigrants in their responses). I would expect the response
14 rate to be considerably lower for this population without the assistance of my students. This expectation
15 is based on my personal experience conducting snowball method surveys without DACA and
16 undocumented student volunteers. It is also based on surveys I have conducted in which respondents
17 were solicited by a professional survey firm. For example, the comparable response rate among Latino
18 immigrants in the professionally collected data for the same survey was much lower, at only
19 approximately 10%.

20 9. The much higher response rate my DACA and undocumented students facilitate in
21 snowball surveying increases the statistical power of my findings. The more responses I collect, the
22 more confident I can be that the conclusions drawn from the research are substantively meaningful. That
23 makes it more likely the research will hold force and persuasiveness with policy and lawmakers.

24 10. My DACA and undocumented students are also essential to the diversity of survey
25 responses in my research. Since I am interested in differences between different populations within the
26 Latino community, it is important for me to get responses from different populations, specifically
27 immigrants and non-immigrants.

1 11. Working with DACA recipients also informs the substance of my research. For example,
2 I am currently studying immigrant coping behaviors in the context of threat, and immigrant status mis-
3 attribution (i.e. identification of individuals as immigrants when they are not). I hold focus groups with
4 volunteer DACA and undocumented students to discuss my current research. They have helped me to
5 understand the threats and discrimination experienced by undocumented and immigrant Latino
6 communities, by explaining how they themselves cope with or handle stress. For example, in one
7 discussion with a group of undocumented and DACA students, I learned that in a threatening
8 environment, in which these students believe people may treat them negatively because of their status or
9 ethnicity, many of the students tend to withdraw from potential interactions. One student even
10 explained to me that he tried to “imagine his skin was lighter” colored, because of the belief that skin
11 color would impact how he was treated. I am a third-generation Mexican American and my particular
12 experience being Latino American is different from theirs. I can read all the books in the world and still
13 not fully understand their perspective as first-generation immigrants who have been without status in the
14 United States.

15 12. The decision to rescind the DACA program is causing negative effects on my DACA and
16 undocumented students. DACA students continue to visit me on a regular basis because students trust
17 and know me as a professor of Latino studies and ally. Typically, students will come to my office two or
18 three times a term with course-related questions while they are in my class. During the fall term, Doe
19 and other students have visited my office ten or more times. These visits were unusual since many of
20 these students, including Doe, were not in my class at the time. During these visits, Doe and others have
21 discussed with me the looming loss of their investment in their educations and the loss of post-graduate
22 employment opportunities. Now, they feel that the time, energy, and money they have put into their
23 education is all for naught, and they are wondering if there is any point in continuing their education.

24 13. During these visits, the students appear scared, anxious, and overwhelmed by the
25 uncertainty caused by the DACA policy rescission. Some of the students have started crying and shaking
26 while in my office. DACA recipients have told me they feel more at risk of deportation than non-DACA
27 recipients, because the government has all their personal information from their DACA application
28 forms, making them easier for immigration enforcement to find.

1 14. Addressing the stress, anxiety and increased needs of these students as a result of the
2 DACA rescission announcement is necessarily diverting attention and time from my research, class
3 preparation and other academic pursuits that are my core role as a professor at the University of
4 California, Davis.

5 15. I expect that undocumented and DACA students in my classes will be less likely to fully
6 participate in their college education than when they had DACA protection. More specifically, I expect
7 that DACA and undocumented students will be less open about their immigration status with me or their
8 classmates due to the fear that identifying themselves will increase the risk of deportation. While in the
9 past students would often share their DACA status in class, already I see that this is no longer the case.
10 DACA students have told me that they are particularly afraid of being at the top of the list for targeting
11 by immigration authorities, because they have provided their detailed information to the government to
12 obtain their DACA status. This fear will impact the quality of discussion of immigration policy in my
13 classes because students who are most knowledgeable and affected by immigration status are rendered
14 less likely to speak up. When UC loses the confidence of students to share their perspectives, the school
15 is robbed of that unique undocumented immigrant narrative.

16 16. The rescission of the DACA program will cause additional harms in the future. I have
17 observed the tendency of undocumented people to go underground in response to fear of immigration
18 authorities, and I am concerned that the end of the DACA program will cause more students who would
19 otherwise have received DACA to do the same, at the cost of their education. First, I expect that fewer
20 otherwise DACA-eligible students will be able attend college. UC expects students to provide some of
21 the cost of attendance through part-time work or other funding. I anticipate that otherwise DACA-
22 eligible students will have difficulty affording school without DACA work authorization. Second,
23 without DACA status and the protection that it provides from federal immigration agents, some
24 undocumented high school students might not apply to college at all. Applying to and attending college
25 creates risks of being caught by immigration enforcement; students may feel safer not putting
26 themselves out in the open.

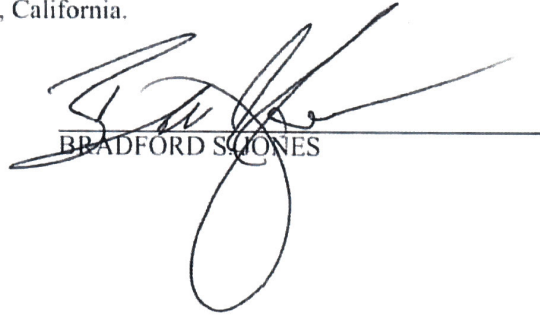
27 17. The rescission of DACA will therefore also make it more difficult for me to conduct my
28 research, which as described above, relies on DACA students. Students like Doe serve as a conduit

1 between academia and oft-overlooked communities of undocumented immigrants, providing important
2 connections and perspectives on immigration status for research like mine.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is true
4 and correct.

5 Executed on October 24, 2017 in Davis, California.

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BRADFORD S. JONES

EXHIBIT 46

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
9 ETHAN D. DETTMER (SBN 196046)
10 JESSE S. GABRIEL (SBN 263137)
11 GIBSON, DUNN & CRUTCHER LLP
12 333 South Grand Avenue
13 Los Angeles, CA 90071-3197
14 Telephone: (213) 229-7000
15 Facsimile: (213) 229-7520
16 Email: tboutrous@gibsondunn.com,
17 edettmer@gibsondunn.com,
18 jgabriel@gibsondunn.com
19 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
20 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
21 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
22 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
26 SECURITY and ELAINE DUKE, in her
27 official capacity as Acting Secretary of the
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF TUAJUANDA C.
JORDAN**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, Dr. Tuajuanda C. Jordan, declare:

2 1. I am the president of St. Mary's College of Maryland ("St. Mary's
3 College" or "SMCM" or the "College").

4 2. I have served as the College's president since July 2014.

5 3. St. Mary's College is a public institution of higher education and an
6 instrumentality of the State of Maryland.

7 4. St. Mary's College holds inclusive diversity as one of our core values and
8 most important strategic priorities. Enrolling approximately 90% of our students from Maryland,
9 it is a constant struggle to attract and enroll students from diverse backgrounds. Such students are
10 critical to our mission of access and are also a critical element of a quality education for all
11 students - majority and minority alike. DACA students, while growing up in Maryland and the
12 United States, bring with them an invaluable depth of experience and empathy. Their attendance
13 at St. Mary's College deepens the understanding of global citizenship for all our students.
14 Benefits include: intercultural awareness, new insights and approaches. The diversity intensifies
15 the richness of the experiences of students/faculty/staff as individuals work and learn together
16 across cultures and languages. Additionally, increases in opportunities to build new skills,
17 conduct research and greater insights and understanding of various cultures represented are
18 benefits.

19 5. As the Public Honors College, a majority of our graduates remain in the
20 State of Maryland for employment. The skill set and talent our graduates contribute include their
21 work, outside civil engagement, and service.

22 6. The benefit of DACA students to the State is real and multi-leveled. On
23 the macro level, as discussed above, DACA students bring to the education of every student a
24 genuine empathy and global perspective otherwise difficult to give Marylanders. Our graduates,
25 most of whom stay, work, and live in Maryland, possess the intellectual skills and values
26 necessary for Maryland to compete in today's global economy. On the micro level, DACA
27 students themselves represent an incredible asset of their collective human potential. These
28 students, many of whom come from disadvantaged backgrounds, already fight against a system

1 that discourages their success as undocumented members of our society. Yet, they succeed,
2 graduating with top-notch college educations built by a work-ethic sorely missing in key
3 elements of our nation. These students, educated in part by State resources, stand ready and
4 willing to apply their talents and energy to making their communities better places to live and
5 work.

6 7. The rescission of the DACA program would negatively impact the
7 opportunity to enroll additional DACA students who, upon graduation, would contribute more
8 greatly to the state's economy because of the earnings premium that a bachelor's degree
9 provides.

10 8. For each DACA student, the loss of work authorization will result in a
11 significant increase in the student's demonstrated need because the student will no longer be able
12 to contribute work earnings to meet the cost of attendance. This additional demonstrated
13 financial need would then be funded from increased institutional financial aid in order to support
14 the persistence to graduation of current students as well as to enroll future students.

15 9. St. Mary's College has not lost faculty or staff yet as a result of the
16 rescission of the DACA program. However, we are ever mindful of the fact that when we fail to
17 protect and embrace one marginalized population, it sends a message of futility, elitism, and
18 exclusion that reverberates throughout our nation's most vulnerable populations. Faculty and
19 staff from diverse and/or international backgrounds perceive aggression against one vulnerable
20 population as an aggression against all vulnerable populations. Frankly, rescission of the DACA
21 program represents nothing less than a shot across the bow of the exact diverse and global
22 faculty and staff that we have worked so hard to attract and retain as part of our educational
23 enterprise.

24 10. In the absence of DACA, prospective DACA student workers would not
25 be able to satisfy the requirements of the I-9 form. The I-9 form and supporting documents
26 identify a worker's right to work in the U.S. An institution cannot legally employ persons who
27 have not satisfied the I-9 requirement within 3 days from date of hire. Beyond these pragmatic
28 and tangible negative outcomes rest the even more detrimental social, emotional impacts. As a

1 college that values personal growth and intellectual transformation, we strive to provide all
2 students with a safe space in which to voice their views, listen to the views of others, fail, re-try,
3 and eventually succeed. For DACA students, the threat of losing the only home they have ever
4 known represents enormous emotional baggage to overcome. For all students, seeing the
5 supposedly safe space of St. Mary's College ripped out from underneath DACA students instills
6 a sense of suspicion and distrust great enough to block their genuine exposure to, and
7 engagement with, transformational learning experiences; one cannot grow when one is
8 imprisoned by a fear of retribution and exclusion.

9 11. The time and resources expended from the College's Office of Student
10 Affairs has been most evident in preparation of staff in the Wellness Center and the Office of
11 Student Support Services on how to support and address these issues should they present
12 themselves. In addition, the Department of Public Safety has had internal discussions on roles
13 and expectations for law enforcement collaboration if external law enforcement were to request
14 assistance or present themselves unannounced on campus.

15 12. At present, the College has one DACA student. In addition to concern
16 about our current student, our students have concerns about the rescission of DACA for
17 prospective students, as well as students' families and friends as related to deportation. This
18 intense stress has a negative impact on students and requires the institution to provide increased
19 services and support for these students based on individual situations. Our Office of Student
20 Support Services and our Wellness Center are the two primary areas where this increased need
21 will likely occur.

22 13. Our students have concern about the rescission of the DACA program for
23 themselves, as well as for their families and friends as related to deportation. This intense stress
24 has a negative impact on the students and requires the institution to provide increased services
25 and support for these students based on individual situations. Our Office of Student Support
26 Services and our Wellness Center are the two primary areas where this increased need will likely
27 occur.
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14. The students who are Dreamers are very talented. St. Mary's College's DACA student has served on search committees for critical positions for SMCM and has served as a student leader orientation, resident assistants, and student government. The student is a critical member of our community who adds more than they take. The current DACA student at St. Mary's College of Maryland is, in fact, a college student and, as such, contributes to the greater good by questioning all that is seen, challenging the status quo, imagining a different world, and working to make Maryland, our nation, and the world a more fair and just world for all.

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

Executed on October 25, 2017, in St. Mary's City, Maryland.


TUAJUANDA C. JORDAN

EXHIBIT 47

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
9 ETHAN D. DETTMER (SBN 196046)
10 JESSE S. GABRIEL (SBN 263137)
11 GIBSON, DUNN & CRUTCHER LLP
12 333 South Grand Avenue
13 Los Angeles, CA 90071-3197
14 Telephone: (213) 229-7000
15 Facsimile: (213) 229-7520
16 Email: tboutrous@gibsondunn.com,
17 edettmer@gibsondunn.com,
18 jgabriel@gibsondunn.com
19 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
20 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
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22 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
26 SECURITY and ELAINE DUKE, in her
27 official capacity as Acting Secretary of the
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF JOHN KELLER

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

CASE NO. 17-CV-05813-WHA

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Pursuant to 28 U.S.C. § 1746(2), I, John Keller, hereby declare as follows:

1. I am the Executive Director of Immigrant Law Center of Minnesota (ILCM), a statewide nonprofit organization. I am over the age of eighteen, am competent to testify as to the matters below, and make this declaration based on personal knowledge.

2. ILCM was established in 1996 as a 501(c)(3) organization. It is located at 450 North Syndicate Street, #200, St Paul, Minnesota 55104. In addition to its primary office in St. Paul, ILCM has four other offices across the state.

3. ILCM is Minnesota's largest provider of free legal immigration services, education, and policy services to low-income immigrants and refugees. More than 4,000 individuals across the state receive legal assistance each year from ILCM, through full representation, brief advice, or other services. In addition to 27 staff members, ILCM has a robust pro bono program through which more than 250 attorneys provide a wide variety of services to Minnesota's immigrants and refugees. ILCM is also one of the state's premier providers of education in immigration law, and is a local leader in the drive to promote fair and just public policy in the area of immigration reform.

4. Irma Marquez Trapero is the Secretary of ILCM's Board of Directors and a member of

DECLARATION OF JOHN KELLER

All DACA Cases (Nos. 17-5211, 17-5235, 17-5329, 17-5380, 17-5813)

1 its Executive Committee. She came to the United States at the age of 9 and was undocumented until the
2 DACA program. She was granted DACA in 2012. She graduated from Gustavus Adolphus College with
3 a Bachelor of Arts degree and double-major in Political Science and Gender Women and Sexuality
4 Studies in 2012. In 2013, she received a Certificate of Commendation from Minnesota Governor Mark
5 Dayton in recognition of her leadership to support the Latino and immigrant community. She was a
6 Policy Fellow at the University of Minnesota Humphrey School of Public Affairs in 2015-2016. She
7 works as the Director of Talent Recruitment at Hiawatha Academies and has also been employed as a
8 paralegal in Twin Cities law offices. Her personal experience and leadership have guided ILCM's board
9 and the organization's commitment to serve DACA recipients and the immigrant community over the
10 last 5 years.

12 5. ILCM has assisted thousands of young people through the Deferred Action for Childhood
13 Arrivals (DACA) program since it began in 2012. Throughout that time, ILCM has had a staff member
14 who has provided legal services full-time to potential DACA applicants from Minnesota, with other staff
15 members and pro bono attorneys providing additional DACA services.

17 6. ILCM's work on behalf of DACA applicants includes: representation before U.S.
18 Citizenship and Immigration Services (USCIS) in initial and renewal DACA and work authorization
19 applications, legal consultations and advice, legal information, and referrals as appropriate to other
20 service providers. Through ILCM's pro bono program, 200 pro bono attorneys have represented clients
21 in initial or renewal DACA applications. Our DACA services reach across the state; ILCM has
22 represented clients from every county in Minnesota in DACA applications.

24 7. Since 2012, ILCM has assisted 1,934 individuals in more than 3,370 DACA matters. We
25 have provided full representation before USCIS to over 1,700 individual DACA applicants, representing
26 those applicants in initial filings, renewal applications, or, in many cases, both. Each of these clients,
27 like all DACA beneficiaries, has lived in the United States since at least 2007 and was younger than 16
28

1 when she or he first came here. For many, the United States is the only home they remember.

2 8. Nearly all DACA applicants, including ILCM's clients, have been successful in obtaining
3 DACA along with the often life-changing benefits provided by the program. Because of DACA,
4 thousands of Minnesotans have been able to work, contribute to their families and communities, and
5 focus on their futures in the United States. DACA grantees qualify for Minnesota driver's licenses,
6 which enable them to commute to work or school, and to provide transportation assistance to their
7 family members. Many DACA grantees have found jobs with employer-sponsored health insurance
8 coverage.

10 9. DACA has profoundly affected our clients' plans and hopes for their future, by freeing
11 them from the fear of deportation and allowing them to pursue professional and educational aspirations.
12 The overwhelming majority of ILCM's DACA clients have graduated from or are enrolled in high
13 school or GED programs. Nearly all of our DACA clients who have finished school are employed and
14 are pursuing career goals.

16 10. The rescission of the DACA program most directly and immediately affects ILCM's
17 1,700 DACA clients and the more than 4,500 other DACA grantees in Minnesota. When their DACA
18 protections expire beginning in March 2018, these thousands of young adults and teenagers will no
19 longer be authorized to work and will lose benefits to which they would otherwise be entitled. Many of
20 these young people have been building careers for five years under the DACA program, and will be
21 forced to abandon their professional ambitions. Additionally, the loss of work authorization will
22 negatively impact the financial and housing stability of the dependents of DACA recipients.

24 11. The rescission order provides a 30-day window for some of Minnesota's DACA
25 recipients whose status expires between September 2017 and March 2018 to renew their expiring DACA
26 status. This 30 day window to reapply is a new change that marks an abrupt change of policy that
27 previously encouraged DACA recipients to file to renew their cards between 3-4 months prior to
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1 termination. Due to this abrupt change MN DACA recipients will be harmed when they are unaware or
2 unable to comply during this arbitrary 30 day window. They will lose status, be unable to renew their
3 two years of successive status and work authorization, and will be subject to deportation due to this
4 abrupt change.

5
6 12. The rescission of the DACA program also affects the estimated 8,000-10,000 additional
7 Minnesota residents that are or would have become eligible to apply for DACA but are now precluded
8 from that opportunity by the rescission order.

9 13. The rescission of DACA has already heightened grantees' fears of immigration
10 apprehension and deportation. These fears lessened significantly during the years of the program, as
11 reflected in reports by ILCM's clients and other grantees. Now, the psychological burdens of being
12 undocumented and unprotected will be worse for many grantees than they were before, given that the
13 federal government is actively and intentionally stripping away the protections that it once provided. At
14 the same time, DACA grantees and their families are more vulnerable than they were five years ago, as
15 the federal government maintains years of personal and family information for each of the grantees,
16 which information can be used at any time for immigration enforcement purposes.

17
18 14. The end of DACA affects thousands of families in Minnesota, including thousands of
19 U.S. citizens. ILCM's DACA clients have more than 870 U.S. citizen children among them, and they
20 live with hundreds of additional U.S. citizen brothers, sisters, and other family members. DACA
21 grantees frequently provide full or partial financial support to these young U.S. citizen relatives. The
22 DACA rescission will cause significant hardships for these family members. First, families will face a
23 loss of income because DACA grantees will not be able to work in the U.S. once the protections expire.
24 In addition, U.S. citizen children and siblings of DACA grantees will suffer the psychological toll of
25 potential apprehension and deportation of their family members.

26
27 15. ILCM will assist Minnesotans who have benefited from DACA, by providing
28

1 informational workshops and legal services to pursue other immigration remedies when appropriate and
2 possible. However, many of the Minnesota residents who have DACA protections are not currently
3 eligible for other immigration relief. Many of those who are eligible for other relief cannot afford a
4 private attorney or find a legal services provider with capacity to provide free representation in
5 complicated cases. DACA grantees who have no other immigration relief available to them, or are not
6 able to find legal representation, will be cut off from the employment and other benefits, and from safety
7 from deportation, that they have accessed since 2012.
8

9
10 I declare under penalty of perjury that the foregoing is true and correct.
11

12 Executed on this 27th day of October, 2017
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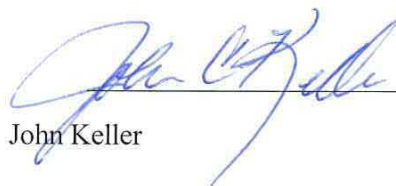
14
15 
16 John Keller

EXHIBIT 48

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavids@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
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17 GIBSON, DUNN & CRUTCHER LLP
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21 Facsimile: (213) 229-7520
22 Email: tboutrous@gibsondunn.com,
23 edettmer@gibsondunn.com,
24 jgabriel@gibsondunn.com
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XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
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JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA and JANET NAPOLITANO, in her official capacity as President of the University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY and ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF CHRISTOPHER KUTZ

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, CHRISTOPHER KUTZ, DECLARE:

2 1. I am the C. William Maxeiner Distinguished Professor of Law in the Jurisprudence and
3 Social Policy Program at University of California, Berkeley (“JSP”). The matters set forth herein are
4 true and correct of my own personal knowledge and, if called as a witness, I could and would testify
5 competently thereto.

6 2. I teach classes in criminal law, moral and political philosophy, and the ethics of
7 international law. I have taught and advised several DACA recipients, including Joel Sati, a second-year
8 JSP student.

9 3. Joel is representative of the rich vein of talent that became available to us as DACA-
10 recipients began working their way through undergraduate programs and began applying for graduate
11 programs. Before the Deferred Action for Childhood Arrivals (“DACA”) policy was introduced, these
12 talented students did not have employment opportunities available to them that made investing in a
13 graduate degree worthwhile. Additionally, some of our graduate programs emphasize international
14 travel and research. Prior to the DACA policy, these students had no option to obtain advance parole and
15 therefore could not engage in the travel necessary to complete their programs.

16 4. I first met Joel when I began recruiting him to join JSP when he was an undergraduate at
17 City College of New York (“CCNY”). In my experience, CCNY has always been a place that produces
18 tremendous intellectuals, but it is not known as an especially nurturing environment. Instead, students
19 there have to struggle to break free from the crowd if they want to build close relationships with their
20 professors. Joel did that. He distinguished himself as a brilliant thinker and he was able to form lasting
21 relationships with several leading academics.

22 5. While at CCNY, Joel co-taught a course with Richard Bernstein, a leading philosophy,
23 constitutional law and political science scholar. Richard wrote a letter of recommendation for Joel when
24 Joel applied for a Soros Foundation grant. It was the best letter of recommendation I have ever read.

25 6. As a student, Joel has exceeded my admittedly high expectations for him. As a relatively
26 young graduate student, he is doing things that would be impressive if done by someone two or three
27 years further along in their studies. In fact, Joel consistently beats out more senior students for the
28 opportunity to present his research. Joel is thinking profound new thoughts in a rigorous and organized

1 way, and is contributing meaningfully to what is, in my opinion, the hardest thing a university is
2 responsible for: generating new ideas.

3 7. Joel's scholarship has already been recognized as noteworthy. As a second-year graduate
4 student, he has been invited to travel to international conferences to present his research. Some
5 conferences have even offered to cover the cost of his attendance. This is unusual for most graduate
6 students, let alone for someone so early in their doctoral studies.

7 8. Based on his academic ability alone, Joel is a once-in-a-decade student. Once you factor
8 in the personal and financial obstacles that Joel overcame to make it to JSP, and the unique perspective
9 that he provides to the field and our program, Joel becomes irreplaceable.

10 9. Joel is a member of a Workshop in Law, Philosophy and Politics with our department this
11 year. The current Workshop is focused on immigration, and Joel provides concrete experiences that
12 ground our philosophical discussion in the real world. Joel is able to draw from his own personal
13 experience to provide context to his scholarship on citizenship that other academics cannot. He draws
14 upon his own experiences navigating different institutions like the healthcare system and the education
15 system as an undocumented individual, using this to explain the actual consequences of policies in
16 concrete terms; this allows him to compare policy alternatives and suggest certain approaches in a
17 credible, persuasive way. He is also able to pose probing questions based on his own lived experiences,
18 that advance the discussion and benefit the other Workshop participants.

19 10. My personal understanding has also benefited from conversations with Joel. One
20 common argument within immigration theory is that citizenship is a relatively minor and discrete right.
21 The theory is that, while citizenship is linked with an individual's ability to participate in the political
22 process—i.e., voting—you can remove citizenship from the larger bundle of rights, and the two most
23 important rights in that bundle—legal rights or human rights—will remain unaffected. Joel has made
24 clear to me that the notion that “citizenship is just about voting” is an oversimplification of a complex
25 reality. He has impressed upon me that you cannot simply filter issues of citizenship out of discussions
26 about issues such as labor policy and effective law enforcement, which also heavily implicate legal
27 rights and human rights.

28

1 11. I have found the contributions that other DACA recipients make in my classes are also
2 invaluable. These students' contributions provide both credence and context to arguments and force the
3 entire class to acknowledge and grapple with the theories presented at a far more nuanced level. In one
4 of my classes, focusing on the intersection of immigration and criminal law, a DACA recipient
5 volunteered her perspective on how marginalized groups view and interact with police. This particular
6 dynamic was covered in the assigned reading and my lecture, but it is radically different for my students
7 to read it in a book or hear it from me than it is for them to hear it from a classmate with personal
8 experience on the subject. As humans, we understand words with an emotional connection, and when
9 someone puts a face and a voice to an argument, we instantly understand that the view is valid and
10 should be taken seriously. When they are exposed to the perspectives of their DACA-recipient
11 classmates, my students are forced to reckon with different—and at times complementary—points of
12 view that they would not otherwise afford the same weight.

13 12. When they share their unique perspectives, DACA recipients' ability to improve
14 understanding is not limited to the classroom environment. Thanks to efforts by our DACA students,
15 understanding within the UC Berkeley community of the complexities of immigration policy has
16 deepened. DACA students at Berkeley have been adamant that all undocumented citizens have claims to
17 respect and dignity. Our DACA recipients have maintained that the tendency to distinguish between
18 "good immigrants" and "bad immigrants" is flawed, forcing out community to think in broader terms
19 about what it means to be an immigrant. It is a testament to the empathy of our DACA students that they
20 are so focused on others who are denied the benefits that DACA conveys.

21 **The Decision to Rescind the DACA Policy has Caused Immediate Harm and Will Continue to**
22 **Harm Our DACA Students, Their Classmates, and The University**

23 13. The decision to rescind the DACA policy is frustrating Joel's professional development.
24 Following the rescission of the DACA policy, Joel was denied advance parole. He had sought advance
25 parole for travel to multiple academic conferences. He will therefore be unable to attend these
26 prestigious international conferences which invited him to present his research. There are benefits for
27 Joel to attending these conferences beyond the opportunity to present his scholarship. Since a main part
28 of securing jobs in academia hinges on who an aspiring professor knows and how large their cast of

1 supporters is, these conferences also serve as important networking opportunities for young academics.
2 Joel is now denied this important opportunity because advance parole ended with the announcement of
3 the DACA policy rescission. His ability to build his global network, an essential part of his journey
4 towards a career in academia, will continue to be frustrated as he is prevented from attending these
5 conferences.

6 14. The rescission of the DACA policy will also result in administrative harms to the
7 University and its faculty. It has already resulted in increased administrative costs, legal fees, and
8 distractions for the University which have resulted in less time and money available to spend on core
9 educational focuses. I have personally experienced this diversion of resources in my capacity as a
10 professor. All these distractions prevent faculty from delivering our resources efficiently, and so, in our
11 role as educators we are harmed.

12 15. But the greatest harm is that the rich vein of talented students the DACA policy opened
13 will be closed. Without the DACA policy, these students will be without work authorization and certain
14 scholarship and financing opportunities, and will therefore find it much harder to finance education at
15 four year programs or in advanced degrees. Additionally, I expect their performance in high school and
16 college will likely be chilled, for fear of standing out. Uncertainty about their futures will dissuade them
17 from making the kinds of investments of time and tuition required for professional programs.

18 16. This means that we at the University of California Berkeley will be unable to attract the
19 once-in-a-decade minds like Joel's that add to our original scholarship. It also means we will be unable
20 to tap into these students' unique histories and perspectives that add so much to our classroom
21 environments and our community discussions around citizenship and identity. These things, once lost,
22 are impossible to replace.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is true
24 and correct.

25 Executed on October 23, 2017 in Berkeley, California.

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28 
CHRISTOPHER KUTZ

EXHIBIT 49

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

14 THEODORE J. BOUTROUS, JR. (SBN 132099)
15 ETHAN D. DETTMER (SBN 196046)
16 JESSE S. GABRIEL (SBN 263137)
17 GIBSON, DUNN & CRUTCHER LLP
18 333 South Grand Avenue
19 Los Angeles, CA 90071-3197
20 Telephone: (213) 229-7000
21 Facsimile: (213) 229-7520
22 Email: tboutrous@gibsondunn.com,
23 edettmer@gibsondunn.com,
24 jgabriel@gibsondunn.com
25 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
26 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
27 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
28 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF JIRAYUT
LATTHIVONGSKORN**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, JIRAYUT LATTHIVONGSKORN, DECLARE:

2 1. I am a party in the above-captioned action. I make this declaration based on my
3 personal knowledge. If called as a witness, I could and would testify competently to the facts stated
4 herein.

5 **Arrival in United States & Early Life**

6 2. I was born in Thailand in 1989. My name is Jirayut Latthivongskorn, but everyone
7 calls me New, which I have gone by since birth. My parents grew up poor, but they both worked
8 hard and through that hard work made their way into the Thai middle class by becoming business
9 owners. I was nine years old when I moved to the United States with my parents. There was a severe
10 economic crash in Southeast Asia in the mid-1990s, and my family lost almost everything.

11 3. Quality academic and career opportunities in Thailand are often dependent on private
12 schooling. After the crash, my parents realized that even if my family could find a way to survive,
13 there was no way they could pay for school for my two siblings and me. My aunt, who was living in
14 Fremont, California, at the time, told us that in the United States, the K-12 public education system
15 might be available and accessible to immigrant children. My parents decided to move our family to
16 California with the hope that we would be able to realize our full potential in the United States and in
17 order to find stable work in the restaurant industry.

18 4. I was raised in Northern California, which I consider to be my home. My family first
19 settled in Fremont, California, where my parents worked cleaning toilets, mopping floors, and
20 waiting tables at various restaurants. In 2004, we moved to Sacramento, where my parents hoped to
21 make more money by opening a restaurant so they could send my siblings and me to college.

22 5. My family is very close. My siblings and I worked alongside our parents for most of
23 our childhoods. We still share one car when we are at home. My parents are dependent on my
24 siblings and me for basic tasks in daily living, including paying bills, writing résumés, assisting them
25 in applying to jobs, and accompanying them to doctors' appointments in order to act as their
26 interpreters.

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1 6. My parents became U.S. Legal Permanent Residents in 2012 (through my brother) and
2 are on track to becoming naturalized U.S. citizens. They have great pride in the United States and
3 feel at home here.

4 7. Growing up, I often felt isolated and lived with the constant fear that I or someone in
5 my family might be deported. My parents always told me just to walk away if anyone asked me any
6 questions about my citizenship status. I vividly remember the fear I felt one time when we were
7 stopped by a police officer for a traffic violation. As the red and blue lights flashed through our back
8 window, I held my breath, hoping that a simple traffic stop would not jeopardize our life in the
9 United States. Every time I came across some sort of government authority, I was reminded that I—
10 unlike my peers or any average American—was deemed as different and therefore vulnerable.

11 8. As I grew older, I continued to experience the challenges of being undocumented and
12 those challenges became more daunting. Most importantly, I could not help contribute financially to
13 my family. After working for years as waiters in restaurants, my parents hoped to realize the
14 American dream by opening their own small business, a restaurant of their own. In 2004, they
15 opened Muang Thai restaurant in Roseville, California. Given the challenges of starting a new
16 business, compounded by the ensuing economic recession, I wanted to help supplement our family's
17 income and help us succeed by working myself. I watched as friends of mine obtained jobs at In-N-
18 Out Burger, Coldstone Creamery, or at other restaurants; the type of jobs sought by any other
19 American teenager.

20 9. In addition, my friends started getting their driver's licenses when we turned sixteen.
21 There was no public transportation in west Sacramento, and, without my own license, my ability to
22 travel freely was curtailed. I could not spend much time with my friends, who could drive where
23 they pleased. I was also embarrassed about why I did not have a driver's license and would make up
24 excuses to cover my shame. Another time, my friends and I went to watch an R-rated movie, and,
25 although I was old enough to buy a ticket to the film, I did not have an ID to prove my age, and so I
26 was turned away at the box office. I left embarrassed, frustrated, and demoralized.

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1 10. The first time I took an airplane, since flying to the United States at age 9, was in June
2 2010. I feared using my Thai passport to get through airport security, and I was so anxious that I had
3 my lawyer on speed-dial. Airports are dangerous places for undocumented people like myself.

4 11. I did not tell anyone I was undocumented until I was in high school, when my close
5 friend noticed that I left my Social Security Number off my college application to the UC schools. I
6 had remained silent all those years because I did not want to risk everything my parents had
7 sacrificed—I hold the lives of my family in my hands every time I make the decision to trust
8 someone enough to tell them about our undocumented status. This made it difficult to form close
9 relationships and it deeply impacted my social and emotional well-being growing up.

10 12. When I was a junior in high school, my mother was diagnosed with ovarian tumors. I
11 was the primary person coordinating her care. As she does not speak English, the language barrier
12 posed a real problem for her care, and, although I was helping her, I had no experience accessing the
13 healthcare system. We had no support navigating the insurance system either. This was a very
14 traumatic experience for me, and I felt very helpless and powerless. Fearing that engaging in
15 negotiations or asking too many questions could lead to negative immigration-related consequences,
16 we often settled for less than excellent care for my mother. We all felt as though we had to settle for
17 whatever we were given. I consider this to be a formative experience in my life. It was after living
18 through my mother's illness that I was determined to become a doctor and devote my life to helping
19 immigrant and low-income communities improve their access to health care.

20 13. My parents always emphasized the importance of hard work and education. While I
21 was in high school, I helped work in my family's restaurant on nights and weekends—cooking,
22 waiting tables, mopping floors, and washing dishes—always balancing these jobs and chores with my
23 schoolwork. I took honors and AP classes with the hope that I could one day achieve my parents'
24 dream for me of receiving higher education here in the United States.

25 **Applying to College, Attending UC Berkeley, and Community Service**

26 14. I graduated as salutatorian of my high school class and was accepted to a number of
27 colleges within the University of California. It was a very proud moment for me and my family, and
28

1 it reflected my parents' hopes for us when they uprooted our lives to move us here so many years
2 ago. I felt like I was achieving the American Dream.

3 15. As excited as I was by the prospect of attending college, I was worried about being
4 able to pay for it. My family was struggling financially, and we were losing a lot of money from the
5 restaurant. As an undocumented immigrant without a Social Security Number, I did not qualify for
6 federal financial aid, and even some institutional funding that is available to documented applicants.

7 16. In March 2008, I learned that I had been offered the Regents Scholarship for UC
8 Davis—the most prestigious scholarship offered to undergraduates, awarded to students based solely
9 on their academic and personal achievements—which would have covered most my tuition costs for
10 all four years. I was so happy and proud, and I thought that, for the first time in my life, I would
11 finally be able to focus only on my schoolwork and not lie awake at night worrying about money. I
12 was optimistic that my family would not have to bear the complete financial burden of my college
13 education.

14 17. That optimism was short-lived. My Regents Scholarship was revoked after the school
15 learned that I was undocumented, and that as such I was ineligible to receive such financial aid under
16 the rules as they existed at that time. The university expressed their regret, and said they hoped that I
17 would let them know if I became eligible for aid in the future.

18 18. I was devastated, but still determined to get a college education. I considered
19 attending community college with the plan of eventually transferring into a 4-year university.
20 However, my family was determined to not let my acceptances to competitive universities go
21 unfulfilled, and to not let financial concerns stand in my way. My family, including my extended
22 family, pitched in and managed to find a way to put together enough funds for my first year at UC
23 Berkeley.

24 19. I was constantly worried about how to pay for the rest of my education and living
25 expenses. To help pay for school, I worked nights as a busboy at a Thai restaurant and secured
26 scholarships from several nonprofit organizations. One of those organizations, Educators for Fair
27 Consideration, introduced me to a community of undocumented individuals and supporters,
28 eventually inspiring me to become an activist organizing for immigrant rights.

1 20. Despite maintaining the rigorous academic schedule necessary to get into medical
2 school and working to pay for my education, I made time to volunteer with several local nonprofit
3 organizations. Among other things, I cared for disabled patients at a local hospital (Alta Bates in
4 Berkeley, CA), assisted low-income and homeless community members through a running a student
5 health organization called the Suitcase Clinic, and provided health and wellness seminars to East
6 Oakland youth as a trained “Healthy Ambassador”.

7 21. While at UC Berkeley, I also advocated for federal and state legislation to assist
8 undocumented communities, and testified before the California Legislature in support of the
9 California Dream Act, which was enacted into law in 2012.

10 22. Even though I was becoming more vocal about my identity as an undocumented
11 person, I still continued to suffer the consequences of that status. In 2011, I was robbed at gunpoint
12 just five blocks from the UC Berkeley campus. I decided not to report the crime to the police out of
13 fear that stepping forward might lead to me being deported. I felt suffocated. An awful, violent act
14 had been perpetrated on me and, yet, I was not able to report the crime or rely on law enforcement to
15 bring me justice. I felt that there was nothing I could do, so I just went back to studying.

16 23. In 2012, I co-founded Pre-Health Dreamers (“PHD”), a national nonprofit
17 organization with over 700 members that provides advice, resources, and advocacy for
18 undocumented students interested in pursuing careers in health care and science. In January 2017,
19 *Forbes* Magazine named me and my co-founder to its “30 Under 30 in Education” list, commending
20 me for being “on the frontline of getting undocumented students into medical professions and on the
21 path to becoming physicians and health care professionals.”

22 24. In 2012, I graduated from UC Berkeley, earning a bachelor’s degree with honors in
23 Molecular & Cellular Biology and Distinction in General Scholarship.

24 **Receiving DACA Status & Applying to Medical School**

25 25. In spite of my excellent academic record, I was told by the Deans of Admissions at
26 several medical schools that I should not apply to their programs because I was undocumented. Dr.
27 Gabriel Garcia of Stanford School of Medicine told me that if he were me, he would not apply to
28 medical school at that time because medical schools did not want to invest their resources in training

1 me if I might not be able to stay in the United States to practice medicine. Refusing to take “no” for
2 an answer, I applied to medical school anyway, but was turned down, as the Deans of Admissions
3 had predicted would happen.

4 26. Exactly one month after I graduated from UC Berkeley, the federal government
5 announced the DACA program on June 15, 2012. I was skeptical at the beginning, so I decided to
6 wait several months before applying. I was nervous about giving my information to the government
7 because I did not know what they would do with it. After observing that the government was living
8 up to its promises to undocumented individuals like me, I decided that I could trust the government
9 and complied with the requirements of the application process, including giving them my identifying
10 information and submitting to a rigorous background check. I trusted that the government would not
11 use my information against me and my family, and I took the government up on the chance to walk
12 on the path of economic and academic opportunity that was paved by the DACA program.

13 27. The ability to renew DACA was particularly important to me. The risk-benefit
14 analysis that I undertook before applying for DACA led me to conclude that it was only worth it if I
15 was able to renew for the foreseeable future. It would not make any sense to give the government my
16 information if I only received DACA for two years, or if after each renewal I faced an uncertain
17 prospect for my future DACA status. Medical school is a long path—I would have at least 4 years of
18 school and 3+ years of residency. I would not be able to be a resident trainee without work
19 authorization. So DACA had to be a long-term solution for me, and the government indicated that it
20 very well could be. Throughout the process of applying for and receiving DACA benefits, I
21 understood that I would be eligible to receive DACA and continue to renew it as long as I continued
22 to play by the rules.

23 28. I applied for DACA in the Fall of 2012. Attached as Exhibit A is a true and correct
24 copy of my initial DACA application, Form I-821D. I paid \$465 dollars for the application.
25 Attached as Exhibit B is a true and correct copy of the payment receipt notice I received from the
26 U.S. government. In connection with my DACA application, I went to a USCIS application support
27 center on October 3, 2012 to have my biometrics taken. Attached as Exhibit C is a true and correct
28 copy of my ASC Appointment Notice dated October 3, 2012.

1 29. I passed the background check and was granted DACA status on January 24, 2013.
2 Attached as Exhibit D is a true and correct copy of my first Notice Of Action that I received from the
3 U.S. government granting my DACA status until October 15, 2014.

4 30. I also applied for and was granted employment authorization at the same time.
5 Attached as Exhibit E is a true and correct copy of my first I-765, Application for Employment
6 Authorization. Attached as Exhibit F is a true and correct copy of the Notice of Action I received
7 from the U.S. government granting me employment authorization until October 15, 2014.

8 31. I applied for renewal of my DACA status on July 18, 2014. Attached as Exhibit G is a
9 true and correct copy of my DACA renewal application, Form I-812D. Attached is Exhibit H is the
10 Notice Of Action that I received from the U.S. government renewing my DACA status until
11 September 25, 2016.

12 32. I again applied for renewal of my DACA status in 2016. Attached as Exhibit I is a
13 true and correct copy of my DACA renewal application, Form I-812D. Attached is Exhibit J is the
14 Notice Of Action that I received from the U.S. government renewing my DACA status until January
15 12, 2019.

16 **Benefits of My DACA Status**

17 33. Being granted DACA status was a “game changer” for me. It immediately opened
18 doors at the medical schools I wanted to apply to. I reapplied to medical schools and, in 2014, I
19 enrolled at the school that I always dreamed of attending—UCSF. I was the first undocumented
20 medical student at UCSF. I am on a five-year track in the Program in Medical Education for the
21 Urban Underserved (“PRIME-US”), which is for students committed to working with urban
22 underserved communities.

23 34. Because of DACA, I was also able to apply for and be granted Advance Parole to visit
24 my 87-year-old grandmother in Thailand, when she was ill in December 2014, my first visit to
25 Thailand since I arrived in the U.S. On that trip, I traveled with my mother and siblings to see my
26 grandmother after she suffered an acute fall, requiring emergency surgery, which compounded her
27 already advanced chronic diseases. The ability to travel back to Thailand was invaluable, and
28 allowed us to be there with her in her most vulnerable moments, and made possible the reunification

1 of our family. Attached as Exhibit K is a true and correct copy of the Authorization for Parole of an
2 Alien Into the United States that I received from the U.S. government.

3 35. DACA also allowed me to immediately start working. I contracted with PHD as an
4 independent contractor from January 2013 to September 2015. I also completed a two-month
5 internship with Health Access California through Health Career Connection during the summer of
6 2013 to advocate for expanding health care access to undocumented Californians. I paid taxes for
7 both these jobs.

8 36. DACA has also allowed me to start building credit. I participated in a Lending Circle
9 through the Mission Asset Fund, which I would not have been able to do without a Social Security
10 Number. I was able to apply for and be approved for credit cards, which allowed me to become more
11 economically flexible and stable.

12 37. Receiving DACA was also life-changing on a more fundamental, personal level. I felt
13 like I could finally breathe easy. I was finally able to do things that I had never been able to do
14 before, and that other people take for granted. After years of lying to my friends, I obtained a
15 driver's license, which helped me commute from Fremont while I was working after college to build
16 PHD.

17 38. I am continuing my work in helping underserved communities. I volunteered at the
18 UCSF student-run homeless clinic, helped to implement a quality improvement project at the San
19 Francisco Department of Public Health's community health center, am involved with several
20 organizations that provide support for undocumented students and other immigrants, and serve on the
21 Board of Directors for Asian Health Services (Oakland, CA) as well as UC President Janet
22 Napolitano's Advisory Council for Undocumented Students.

23 39. Being undocumented helps me relate to my underserved and undocumented patients in
24 ways that many other medical students and doctors cannot. Because of my personal experiences with
25 my mother's health issues, I can understand—and help overcome—the barriers to healthcare access
26 and trust that my patients experience. My personal knowledge of these barriers also helps me to
27 advocate for changes in public health policy.

28

1 40. In December 2016, in my third year of medical school, I was working at the
 2 Zuckerberg San Francisco General Hospital for my pediatrics rotation. A patient came to the urgent
 3 care clinic and was having an asthma attack. He was a fifteen-year-old undocumented teenager who
 4 had just arrived as an unaccompanied minor from Guatemala. He was shocked to hear that I was
 5 undocumented as well. I spoke to his brother and sister and explained how he could still enroll in
 6 high school and college. Because of my background, I was not only able to help him with his
 7 physical symptoms, but also with social determinants that affect health, like education and housing.
 8 That is the different type of provider I and other undocumented students can become.

9 41. In February 2017, I applied for Legal Permanent Resident status. I hoped that this step
 10 would continue my road to inclusion in U.S. society.

11 42. In April 2017, I was awarded the U.S. Public Health Service's prestigious Excellence
 12 in Public Health Award, which is given to medical students who are involved in local public health
 13 issues and advance the U.S. Public Health Service's mission to "protect, promote, and advance the
 14 health and safety of our Nation."

15 43. In August 2017, I began pursuing a Masters of Public Health in Health Policy at the
 16 Harvard T.H. Chan School of Public Health. I knew that clinical medicine alone would not be
 17 enough for me to make the impact that I envisioned. Since I have begun medical school, my story
 18 has not changed—and the needs of the communities that I want to help have not changed, in fact they
 19 are stronger than ever. I plan to become a physician who influences health policy and changes the
 20 status quo of healthcare delivery, thereby reducing health disparities and expanding access to
 21 affordable, quality care for the uninsured, low-income, homeless, immigrant communities—just like
 22 the ones in which I grew up and those that I have worked with.

Impact of Announcement of Rescission of DACA

24 44. While there had been political talk about impact to the DACA program under the
 25 current administration, I took comfort in events following the transition from the Obama
 26 Administration to the Trump Administration, and actions taken and statements made by the President
 27 and others. First, in February 2017, the Trump Administration exempted DACA from the early
 28 repeal of other immigration actions. That was a positive sign for DACA recipients. Next, I read

1 President Trump’s words in an April 2017 interview that “dreamers should rest easy,” and his answer
2 that his administration’s policy was to allow DACA recipients to stay. I also read reports issued on
3 June 15, 2017 that the administration would continue to allow for DACA renewals and that the
4 DACA program would remain in effect. Those reports provided hope that the DACA program would
5 continue.

6 45. Less than three months later, however, on September 5, 2017, the Administration
7 announced the rescission of the DACA program. That announcement threw my life into chaos and
8 has been a shock to my world: educationally, professionally, emotionally, and physically. Since the
9 rescission of DACA was announced, I have not been sleeping well because of the anxiety the
10 announcement caused and the frustration about not knowing where my future stands. In fact, I have
11 suffered sleeplessness for the first time in my life. I wanted to make the most out of my year at
12 Harvard by immersing myself in study of health policy and by developing connections for my future
13 career. But that career was put in jeopardy just a week after I started school, with the announcement
14 of the end of the DACA program upending my life. As a result, I have been paralyzed by the fear
15 that I will lose everything that I had worked so hard to achieve—that my future would vanish in a
16 flash. My focus has been taken away from the important opportunities available to me at Harvard.

17 46. The announcement of the rescission of DACA has consumed significant emotional
18 energy, and I live in fear of the loss of the future my parents and I had worked so hard to create. The
19 stress is unbearable. Following the announcement that the DACA program would be ended, I have
20 suffered headaches for the first time in my life, and I have no doubt that the stress and headaches are
21 due to the chaos that the announcement of the rescission of DACA has caused me.

22 47. The announcement of the end of the DACA program is already affecting my education
23 and professional prospects. I was planning to travel internationally as part of my MPH studies at
24 Harvard. During the month of January, international travel for MPH students is common, and I
25 hoped and planned to travel as part of the program, in January 2018. Without the ability to do so, I
26 would be one of the few students not to travel internationally as part of my MPH program, which
27 would place me at a disadvantage against my colleagues.

28

1 48. And, in my fourth year of medical school, I was planning on completing an away
2 rotation in an international country, to be able to have more experience with global health work,
3 serving needy communities abroad. This will be impossible if my DACA is rescinded.

4 49. I am due to apply for residency next year. Without DACA and without my work
5 authorization, however, I will become ineligible to apply for and be considered by residency
6 programs across the country. I have spent years of my life working tirelessly towards this goal, and
7 having my dream snatched away from me so close to the finish line hurts emotionally more than I
8 imagined, and causes me great stress on a daily basis ever since the government announced that
9 DACA would be rescinded.

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

11
12 Executed on OCTOBER 30, 2017, in Cambridge, Massachusetts.

13
14 
15 JIRAYUT LATTHIVONGSKORN

EXHIBIT A



**Consideration of Deferred Action
for Childhood Arrivals**
Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-821D
OMB No. 1615-0124
Expires 02/28/2013

For USCIS Use Only	A- <input type="text"/>	Receipt	Action Block
	Case ID: <input type="text"/>		
	<input type="checkbox"/> Requestor interviewed on <input type="text"/>		
Returned: <input type="text"/>	Released	Received: <input type="text"/>	Remarks
Resubmitted: <input type="text"/>		Sent: <input type="text"/>	
To Be Completed by an <i>Attorney or Accredited Representative</i> , if any.		<input checked="" type="checkbox"/> Fill in box if G-28 is attached to represent the requestor.	Attorney State License Number: 254446

▶ **START HERE - Type or print in black ink.**

Part 1. Information About You

I am requesting consideration of deferred action for childhood arrivals *and* I have included Form I-765, Application for Employment Authorization, and Form I-765WS, Form I-765 Worksheet.

Full Name

1.a. Family Name (Last Name)

1.b. Given Name (First Name)

1.c. Middle Name

Mailing Address

2.a. In Care of Name (if applicable)

2.b. Street Number and Name

2.c. Apt. Ste. Flr.

2.d. City or Town

2.e. State 2.f. Zip Code

Removal Proceedings Information

3.a. Are you **now** or **have you ever been** in removal proceedings? Yes No

If you answered "Yes" to the above question, you must check a box below indicating your current status or outcome of your removal proceedings.

3.b. Type of proceedings:

a. Currently in Proceedings c. Terminated

b. Administratively Closed d. Subject to a Final Order

3.c. Date and Location of Proceedings

**For USCIS
Use Only**

Part 1. Information About You (continued)

Other Information

- 4. Alien Registration Number (A-Number)(if any)
▶ A-
- 5. U.S. Social Security Number (if any)
▶
- 6. Date of Birth (mm/dd/yyyy) ▶
- 7. Gender Male Female
- 8.a. City/Town/Village of Birth
- 8.b. Country of Birth
- 9. Country of Residence
- 10. Country of Citizenship/Nationality
- 11. Marital Status
 Married Widowed Single Divorced

Other Names Used (including maiden name)

If you require additional space, use **Part 7., Additional Information.**

- 12.a. Family Name (Last Name)
- 12.b. Given Name (First Name)
- 12.c. Middle Name

U.S. Entry Information

- 13. Date of **Initial** Entry into the United States, on or about:
(mm/dd/yyyy) ▶
- 14. Place of Entry into the United States.

- 15. Status at Entry (e.g., B2, F1, J1, No Lawful Status, etc.)

- 16.a. Do you have an Arrival/Departure Record (I-94)? Yes No

- 16.b. List your I-94 number (if applicable)
▶

- 17. Date authorized stay expired, as shown on Form I-94, I-95, or I-94W (if applicable)
(mm/dd/yyyy) ▶

Education Information

- 18. Current Education Status (e.g., In School, General Educational Development, High School Graduate)
- 19. Name, City, and State of School Currently Attending or Where Education Received
- 20. Date of Last Attendance, Graduation, Receipt of General Educational Development Certificate, and/or Completion Certificate (mm/dd/yyyy) ▶

Military Service Information

- 21.a. Were you a member of the U.S. Armed Forces or Coast Guard? Yes No

If you answered "Yes" to the above question, you must provide responses to Item Numbers 21.b. through 21.e.

- 21.b. Military Branch
- 21.c. Service Start Date (mm/dd/yyyy) ▶
- 21.d. Discharge Date (mm/dd/yyyy) ▶
- 21.e. Type of Discharge

**For USCIS
Use Only**

Part 2. Arrival/Residence Information

1.a. I arrived in the United States on or before June 15, 2007.
 Yes No

1.b. I have been continuously residing in the United States since at least June 15, 2007.
 Yes No

NOTE: If you answer "No" to Item Numbers 1.a. or 1.b., use **Part 7., Additional Information**, to include a full explanation.

List your current address and, to the best of your knowledge, the addresses where you resided since your initial entry into the United States. If you require additional space, use **Part 7., Additional Information**.

Present Address

2.a. Dates at this residence (mm/dd/yyyy)
From: To:

2.b. Street Number and Name

2.c. Apt. Ste. Flr.

2.d. City or Town

2.e. State 2.f. Zip Code

Address 1

3.a. Dates at this residence (mm/dd/yyyy)
From: To:

3.b. Street Number and Name

3.c. Apt. Ste. Flr.

3.d. City or Town

3.e. State 3.f. Zip Code

Address 2

4.a. Dates at this residence (mm/dd/yyyy)
From: To:

4.b. Street Number and Name

4.c. Apt. Ste. Flr.

4.d. City or Town

4.e. State 4.f. Zip Code

Address 3

5.a. Dates at this residence (mm/dd/yyyy)
From: To:

5.b. Street Number and Name

5.c. Apt. Ste. Flr.

5.d. City or Town

5.e. State 5.f. Zip Code

List all your absences from the United States since June 15, 2007. If you require additional space, use **Part 7., Additional Information**.

6.a. Departure Date 1 (mm/dd/yyyy)

6.b. Return Date 1 (mm/dd/yyyy)

6.c. Reason for Departure

7.a. Departure Date 2 (mm/dd/yyyy)

7.b. Return Date 2 (mm/dd/yyyy)

7.c. Reason for Departure

**For USCIS
Use Only**

Part 3. Criminal, National Security and Public Safety Information

If any of the following questions apply to you, use **Part 7, Additional Information**, to describe the circumstances and include a full explanation.

1. Have you ever been arrested for, charged with, or convicted of a felony or misdemeanor in the United States? *Do not include minor traffic violations that only resulted in a fine, unless it was alcohol- or drug-related.*
 Yes No

If you answered "Yes" you must also include copies of all arrest records, charging documents, dispositions (outcomes), sentencing records, etc.

2. Have you ever been arrested for, charged with, or convicted of a crime in any country other than the United States?
 Yes No

If you answered "Yes" you must also include copies of all arrest records, charging documents, dispositions (outcomes), sentencing records, etc.

3. Have you ever engaged in or do you continue to engage in or plan to engage in terrorist activities?
 Yes No
4. Are you now or have you ever been a member of a gang?
 Yes No

Have you ever engaged in, ordered, incited, assisted or otherwise participated in any of the following:

- 5.a. Acts involving torture, genocide, or human trafficking?
 Yes No
- 5.b. Killing any person?
 Yes No
- 5.c. Severely injuring any person?
 Yes No
- 5.d. Any kind of sexual contact or relations with any person who was being forced or threatened?
 Yes No

Part 4. Signature of Requestor

Requestor's Statement (check one)

- 1.a. I can read and understand English, and have read and understand each and every question and instruction on this form, as well as my answer to each question.
- 1.b. Each and every question and instruction on this form, as well as my answer to each question, has been read to me by the person named below

in a language in which I am fluent. I understand each and every question and instruction on this form, as well as my answer to each question.

Requestor's Certification

I certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct. Copies of documents submitted are exact photocopies of unaltered original documents, and I understand that I may be required to submit original documents to USCIS at a later date. Furthermore, I authorize the release of any information from my records that USCIS needs to reach a determination on deferred action.

2.a. Signature of Requestor

2.b. Date of Signature (mm/dd/yyyy) ▶

3. Daytime Phone Number () -

NOTE: Deferred action is unlikely to be considered for anyone who fails to completely fill out this form or to submit required documents listed in the instructions. Deferred action does not confer lawful status upon an individual. Furthermore, a decision on deferred action is wholly within the discretion of DHS.

**For USCIS
Use Only**

Part 5. Signature of Person Preparing This Request, If Other Than the Requestor

NOTE: If you are an attorney or representative, you must submit a completed Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative, along with this request.

- 1. Attorney or Representative: In the event of a Request for Evidence (RFE), may USCIS contact you by e-mail?
 Yes No

Preparer's Full Name

Provide the following information concerning the preparer:

- 2.a. Preparer's Family Name (*Last Name*)
- 2.b. Preparer's Given Name (*First Name*)
- 3. Preparer's Business or Organization Name

Preparer's Mailing Address

- 4.a. Street Number and Name
- 4.b. Apt. Ste. Flr.
- 4.c. City or Town
- 4.d. State 4.e. Zip Code

Preparer's Contact Information

- 5. Daytime Phone Number () -
- 6. Email Address

Preparer's Declaration

To be completed by all preparers, including attorneys and authorized representatives.

I declare that I prepared this Form I-821D at the requestor's behest, that it is based on all the information of which I have knowledge, and that the information is true to the best of my knowledge.

- 7.a. Signature of Preparer
- 7.b. Date of Signature (*mm/dd/yyyy*) ▶

Part 6. Signature of Interpreter

- 1. Language Used

I certify that I am fluent in English and the language above. I further certify that I have read each and every question and instruction on this form, as well as the answer to each question, to this requestor in the above-mentioned language, and that the requestor has informed me that he or she has understood each and every instruction and question of the form, as well as the answer to each question.

- 2.a. Signature of Interpreter
- 2.b. Date of Signature (*mm/dd/yyyy*) ▶

Interpreter's Information

- 3.a. Interpreter's Family Name (*Last Name*)
- 3.b. Interpreter's Given Name (*First Name*)

**For USCIS
Use Only**

Part 7. Additional Information

If you require more space to provide any additional information within this request, please use the space below. If you require more space than what is provided to complete this request, you may use a separate sheet(s) of paper. You must include your full name on each sheet of paper along with the page number, Part Number, and Item Number related to your explanation.

Your Full Name

1.a. Family Name (Last Name)
1.b. Given Name (First Name)
1.c. Middle Name

2.a. Page Number 2.b. Part Number 2.c. Item Number

2.d. I initially entered the U.S. on 3/19/2001 and I left on April 28, 2001. My second entry was on May 5, 1995 and I left on May 24, 1995. MY LAST Entry when I stayed and continuously resided was on March 13, 1999.

3.a. Page Number 3.b. Part Number 3.c. Item Number

3.d. _____

4.a. Page Number 4.b. Part Number 4.c. Item Number

4.d. _____

**For USCIS
Use Only**

EXHIBIT B

U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE September 04, 2012
CASE TYPE I-765, Application for Employment Authorization		USCIS ALIEN NUMBER [REDACTED]
RECEIPT NUMBER WAC1290517738	RECEIVED DATE August 31, 2012	PAGE 1 of 1
		DATE OF BIRTH [REDACTED]

JIRAYUT LATTHIVONGSKORN



17 3005



PAYMENT INFORMATION:

Application/Petition Fee: \$465.00
 Biometrics Fee: \$0.00
 Total Amount Received: \$465.00
 Total Balance Due: \$0.00

NAME AND MAILING ADDRESS

Full and complete payment has been received on the above application. **Please notify us immediately if any of the above information is incorrect.** If you find it necessary to contact this office in writing, you must include a copy of this receipt notice with your inquiry.

BIOMETRICS -

The next step is to have your biometrics taken at a USCIS Application Support Center (ASC). You will receive a notice in the mail regarding when USCIS has scheduled you for your ASC appointment.

If you have questions about possible immigration benefits and services, filing information, or USCIS forms, please call the USCIS National Customer Service Center (NCSC) at **1-800-375-5283**. If you are hearing impaired, please call the NCSC TDD at **1-800-767-1833**. Please also refer to the USCIS website: www.uscis.gov.

If you have any questions or comments regarding this notice or the status of your case, please contact our customer service number.

You will be notified separately about any other case you may have filed.

USCIS Office Address:

USCIS
 California Service Center
 P.O. Box 30111
 Laguna Niguel, CA 92607-0111

USCIS Customer Service Number:

(800)375-5283



EXHIBIT C

Department of Homeland Security
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

ASC Appointment Notice		APPLICATION NUMBER WAC1290517738	NOTICE DATE 9/12/2012
CASE TYPE I821D Consideration of Deferred Action for Childhood Arrivals		SOCIAL SECURITY NUMBER	USCIS A# [REDACTED]
		TCR	SERVICE CENTER WSC
			CODE 3
			PAGE 1 of 1

JIRAYUT LATTHIVONGSKORN
[REDACTED]



To process your request, U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics.

PLEASE APPEAR AT THE BELOW APPLICATION SUPPORT CENTER AT THE DATE AND TIME SPECIFIED. IF YOU FAIL TO APPEAR AS SCHEDULED, YOUR REQUEST WILL BE CONSIDERED ABANDONED.

APPLICATION SUPPORT CENTER

USCIS OAKLAND
8000 EDGEWATER DRIVE
OAKLAND, CA 94621

PLEASE READ THIS ENTIRE NOTICE CAREFULLY.

DATE AND TIME OF APPOINTMENT

10/03/2012
10:00 AM

WHEN YOU GO TO THE APPLICATION SUPPORT CENTER TO HAVE YOUR BIOMETRICS TAKEN, YOU MUST BRING:

- 1. THIS APPOINTMENT NOTICE** and
- 2. PHOTO IDENTIFICATION.** Requestors must bring their Permanent Resident Card/Resident Alien Card, or a passport, driver's license, national ID, military ID, or State-issued photo ID. If you appear without proper identification, your biometrics may not be taken.

CELL PHONES, CAMERAS, OR OTHER RECORDING DEVICES ARE NOT PERMITTED.

REQUEST FOR RESCHEDULING

Please reschedule my appointment. Upon receipt of your request, you will be provided a new appointment notice. Make a copy of this notice for your records, then mail the original with your request to BPU, Alexandria ASC, Suite 100, 8850 Richmond Hwy, Alexandria, VA 22309-1586

APPLICATION NUMBER
I821D - WAC1290517738



BIOMETRICS PROCESSING STAMP
ASC SITE CODE
BIOMETRICS QA REVIEW BY [Signature] **OCT 03 2012**
ON
FINGERPRINTS QA REVIEW BY [Signature] **OCT 03 2012**
ON

If you have any questions regarding this notice, please call 1-800-375-5283.

WARNING: Due to limited seating availability in our lobby area, only persons who are necessary to assist with transportation or completing the biometrics worksheet should accompany you. If you have open wounds or bandages/casts when you appear, the USCIS may reschedule your appointment if it is determined your injuries will interfere with taking your biometrics.

Please see the back of this notice for important information.

EXHIBIT D



RECEIPT NUMBER WAC-12-905-17737		CASE TYPE I821 /I-821D
RECEIPT DATE September 4, 2012	PRIORITY DATE	APPLICANT [REDACTED] LATTHIVONGSKORN, JIRAYUT
NOTICE DATE January 24, 2013	PAGE 1 of 1	
JIRAYUT LATTHIVONGSKORN [REDACTED]		Notice Type: Approval Notice Valid from 10/16/2012 to 10/15/2014

This courtesy notice is to advise you of action taken on this case. The official notice has been mailed to the authorized representative. Any relevant documentation included in the notice was also mailed as part of the official notice.

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. If granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at www.uscis.gov. There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC

CALIFORNIA SERVICE CENTER

P. O. BOX 30111

LAGUNA NIGUEL CA 92607-0111

Customer Service Telephone: (800) 375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

Additional Information

GENERAL.

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

INQUIRIES.

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

APPROVAL OF NONIMMIGRANT PETITION.

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

APPROVAL OF AN IMMIGRANT PETITION.

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

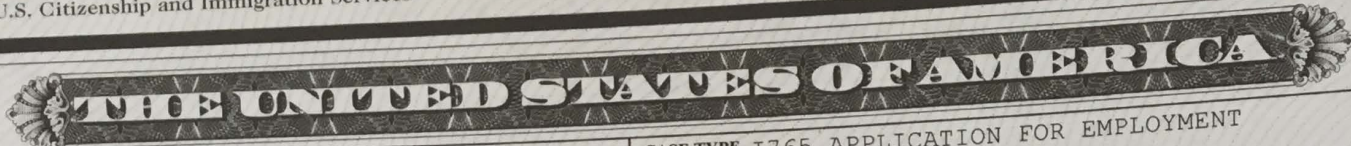
If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status*.

EXHIBIT F

Department of Homeland Security
U.S. Citizenship and Immigration Services



RECEIPT NUMBER WAC-12-905-17738		CASE TYPE I765 APPLICATION FOR EMPLOYMENT AUTHORIZATION	
RECEIPT DATE September 4, 2012	PRIORITY DATE	APPLICANT [REDACTED]	
NOTICE DATE January 24, 2013	PAGE 1 of 1	LATTHIVONGSKORN, JIRAYUT	
JIRAYUT LATTHIVONGSKORN [REDACTED]		Notice Type: Approval Notice Class: C33 Valid from 10/16/2012 to 10/15/2014	

This courtesy notice is to advise you of action taken on this case. The official notice has been mailed to the authorized representative. Any relevant documentation included in the notice was also mailed as part of the official notice.

Your application for employment authorization has been approved. The Form I-766, Employment Authorization Document, was sent under separate cover to the beneficiary.

This card authorizes your employment in the United States. Show this card to your employer to verify authorization to work during the dates on the card.

If any information on the card is incorrect, please write the office listed below. Include your Employment Authorization Document, I-766, a photocopy of this notice, and evidence to support the necessary corrections.

THIS APPROVAL NOTICE IS NOT A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZATION, NOR MAY IT BE USED IN PLACE OF A VISA OR FORM I-766.

As a reminder, you may request to change employers under INA 204(j) if your Form I-485 Adjustment application has been pending for at least 180 days and your underlying Form I-140 is approved or is still pending. In order to do so, you should supplement the Form I-485 record of proceeding with documentation relating to the new job offer that forms the basis of the INA 204(j) portability request. For more information on how to request to change employers and what information is required to supplement the Form I-485, please visit www.uscis.gov.

This courtesy copy may not be used in lieu of official notification to demonstrate the filing or processing action taken on this case.

THIS FORM IS NOT A VISA NOR MAY IT BE USED IN PLACE OF A VISA.

NOTICE: Although this application/petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify the information submitted in this application, petition and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of verification will be used to determine whether revocation, rescission, and/or removal proceedings are appropriate. Applicants, petitioners, and representatives of record will be provided an opportunity to address derogatory information before any formal proceeding is initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC

CALIFORNIA SERVICE CENTER

P. O. BOX 30111

LAGUNA NIGUEL CA 92607-0111

Customer Service Telephone: (800) 375-5283



EXHIBIT G



**Consideration of Deferred Action
for Childhood Arrivals**

Department of Homeland Security
U.S. Citizenship and Immigration Services

**USCIS
Form I-821D**
OMB No. 1615-0124
Expires 06/30/2016

For USCIS Use Only	A- <input type="text"/>	Receipt	Action Block
	Case ID: <input type="text"/>		
	<input type="checkbox"/> Requestor interviewed on <input type="text"/>		
Returned: / /	Relocated	Received: / /	Remarks
Resubmitted: / /	Sent: / /		
To Be Completed by an Attorney or Accredited Representative, if any.		<input type="checkbox"/> Select this box if Form G-28 is attached to represent the requestor.	Attorney State Bar Number (if any): <input type="text"/>

▶ **START HERE** - Type or print in black ink. Read Form I-821D Instructions for information on how to complete this form.

Part 1. Information About You (For Initial and Renewal Requests)

I am not in immigration detention *and* I have included Form I-765, Application for Employment Authorization, and Form I-765WS, Form I-765 Worksheet; and

I am requesting:

1. **Initial Request** - Consideration of Deferred Action for Childhood Arrivals

OR

2. **Renewal Request** - Consideration of Deferred Action for Childhood Arrivals

AND

For this Renewal request, my most recent period of Deferred Action for Childhood Arrivals expires on

(mm/dd/yyyy) ▶

Full Legal Name

3.a. Family Name (Last Name)

3.b. Given Name (First Name)

3.c. Middle Name

U.S. Mailing Address (Enter the same address on Form I-765)

4.a. In Care Of Name (if applicable)

4.b. Street Number and Name

4.c. Apt. Ste. Flr.

4.d. City or Town

4.e. State 4.f. ZIP Code

Removal Proceedings Information

5. Are you **NOW** or have you **EVER** been in removal proceedings, or do you have a removal order issued in any other context (for example, at the border or within the United States by an immigration agent)?

Yes No

NOTE: The term "removal proceedings" includes exclusion or deportation proceedings initiated before April 1, 1997; an Immigration and Nationality Act (INA) section 240 removal proceeding; expedited removal; reinstatement of a final order of exclusion, deportation, or removal; an INA section 217 removal after admission under the Visa Waiver Program; or removal as a criminal alien under INA section 238.

If you answered "Yes" to **Item Number 5.**, you must select a box below indicating your current status or outcome of your removal proceedings.

Status or outcome:

- 5.a. Currently in Proceedings (Active)
- 5.b. Currently in Proceedings (Administratively Closed)
- 5.c. Terminated
- 5.d. Subject to a Final Order
- 5.e. Other. Explain in **Part 8. Additional Information.**

5.f. Most Recent Date of Proceedings (mm/dd/yyyy) ▶

5.g. Location of Proceedings

Part 1. Information About You (For Initial and Renewal Requests) (continued)

Other Information

- 6. Alien Registration Number (A-Number) (if any)
 - ▶ A- [REDACTED]
- 7. U.S. Social Security Number (if any)
 - ▶ [REDACTED]
- 8. Date of Birth (mm/dd/yyyy) ▶ [REDACTED]
- 9. Gender Male Female
- 10.a. City/Town/Village of Birth
 - [REDACTED]
- 10.b. Country of Birth
 - THAILAND
- 11. Current Country of Residence
 - UNITED STATES
- 12. Country of Citizenship or Nationality
 - THAILAND
- 13. Marital Status
 - Married Widowed Single Divorced

Other Names Used (If Applicable)

If you need additional space, use **Part 8. Additional Information.**

- 14.a. Family Name (Last Name) [REDACTED]
- 14.b. Given Name (First Name) [REDACTED]
- 14.c. Middle Name [REDACTED]

Processing Information

- 15. Ethnicity (Select **only one** box)
 - Hispanic or Latino
 - Not Hispanic or Latino
- 16. Race (Select **all applicable** boxes)
 - White
 - Asian
 - Black or African American
 - American Indian or Alaska Native
 - Native Hawaiian or Other Pacific Islander
- 17. Height Feet Inches
- 18. Weight Pounds
- 19. Eye Color (Select **only one** box)
 - Black Blue Brown
 - Gray Green Hazel
 - Maroon Pink Unknown/Other
- 20. Hair Color (Select **only one** box)
 - Bald (No hair) Black Blond
 - Brown Gray Red
 - Sandy White Unknown/Other

Part 2. Residence and Travel Information (For Initial and Renewal Requests)

- 1. I have been continuously residing in the U.S. since at least June 15, 2007, up to the present time. Yes No

NOTE: If you departed the United States for some period of time before your 16th birthday and returned to the United States on or after your 16th birthday to begin your current period of continuous residence, and if this is an initial request, submit evidence that you established residence in the United States prior to 16 years of age as set forth in the instructions to this form.

For Initial Requests: List your current address and, to the best of your knowledge, the addresses where you resided since the date of your initial entry into the United States to present.

For Renewal Requests: List only the addresses where you resided since you submitted your last Form I-821D that was approved.

If you require additional space, use **Part 8. Additional Information.**

Part 2. Residence and Travel Information (For Initial and Renewal Requests) (continued)

Present Address

2.a. Dates at this residence (mm/dd/yyyy)
 From ▶ 01/01/2009 To ▶ Present

2.b. Street Number and Name [REDACTED]

2.c. Apt. Ste. Flr.

2.d. City or Town [REDACTED]

2.e. State [REDACTED] 2.f. ZIP Code [REDACTED]

Address 1

3.a. Dates at this residence (mm/dd/yyyy)
 From ▶ To ▶

3.b. Street Number and Name

3.c. Apt. Ste. Flr.

3.d. City or Town

3.e. State ZIP Code 3.f. ZIP Code

Address 2

4.a. Dates at this residence (mm/dd/yyyy)
 From ▶ To ▶

4.b. Street Number and Name

4.c. Apt. Ste. Flr.

4.d. City or Town

4.e. State ZIP Code 4.f. ZIP Code

Address 3

5.a. Dates at this residence (mm/dd/yyyy)
 From ▶ To ▶

5.b. Street Number and Name

5.c. Apt. Ste. Flr.

5.d. City or Town

5.e. State ZIP Code 5.f. ZIP Code

Travel Information

For Initial Requests: List all of your absences from the United States since June 15, 2007.

For Renewal Requests: List only your absences from the United States since you submitted your last Form I-821D that was approved.

If you require additional space, use **Part 8. Additional Information.**

Departure 1

6.a. Departure Date (mm/dd/yyyy) ▶

6.b. Return Date (mm/dd/yyyy) ▶

6.c. Reason for Departure

Departure 2

7.a. Departure Date (mm/dd/yyyy) ▶

7.b. Return Date (mm/dd/yyyy) ▶

7.c. Reason for Departure

8 Have you left the United States without advance parole on or after August 15, 2012? Yes No

9.a. What country issued your last passport?

9.b. Passport Number

9.c. Passport Expiration Date (mm/dd/yyyy) ▶

10. Border Crossing Card Number (if any)

Part 3. For Initial Requests Only

1. I initially arrived and established residence in the U.S. prior to 16 years of age. Yes No

2. Date of **Initial** Entry into the United States (on or about) (mm/dd/yyyy) ▶

3. Place of **Initial** Entry into the United States

Part 3. For Initial Requests Only *(continued)*

4. Immigration Status on June 15, 2012 (e.g., No Lawful Status, Status Expired, Parole Expired)
- 5.a. Were you **EVER** issued an Arrival-Departure Record (Form I-94, I-94W, or I-95)? Yes No
- 5.b. If you answered "Yes" to **Item Number 5.a.**, provide your Form I-94, I-94W, or I-95 number (if available).
 ▶
- 5.c. If you answered "Yes" to **Item Number 5.a.**, provide the date your authorized stay expired, as shown on Form I-94, I-94W, or I-95 (if available).
 (mm/dd/yyyy) ▶

Education Information

6. Indicate how you meet the education guideline (e.g., Graduated from high school, Received a general educational development (GED) certificate or equivalent state-authorized exam, Currently in school)
7. Name, City, and State of School Currently Attending or Where Education Received
8. Date of Graduation (e.g., Receipt of a Certificate of Completion, GED certificate, other equivalent state-authorized exam) or, if currently in school, date of last attendance. (mm/dd/yyyy) ▶

Military Service Information

9. Were you a member of the U.S. Armed Forces or U.S. Coast Guard? Yes No
- If you answered "Yes" to **Item Number 9.**, you must provide responses to **Item Numbers 9.a. - 9.d.**
- 9.a. Military Branch
- 9.b. Service Start Date (mm/dd/yyyy) ▶
- 9.c. Discharge Date (mm/dd/yyyy) ▶
- 9.d. Type of Discharge

Part 4. Criminal, National Security, and Public Safety Information *(For Initial and Renewal Requests)*

If any of the following questions apply to you, use **Part 8. Additional Information** to describe the circumstances and include a full explanation.

1. Have you **EVER** been arrested for, charged with, or convicted of a felony or misdemeanor, including incidents handled in juvenile court, in the United States? Do not include minor traffic violations unless they were alcohol- or drug-related. Yes No

If you answered "Yes," you must include a certified court disposition, arrest record, charging document, sentencing record, etc., for each arrest, unless disclosure is prohibited under state law.

2. Have you **EVER** been arrested for, charged with, or convicted of a crime in any country other than the United States? Yes No

If you answered "Yes," you must include a certified court disposition, arrest record, charging document, sentencing record, etc., for each arrest.

3. Have you **EVER** engaged in, do you continue to engage in, or plan to engage in terrorist activities? Yes No

4. Are you **NOW** or have you **EVER** been a member of a gang? Yes No

5. Have you **EVER** engaged in, ordered, incited, assisted, or otherwise participated in any of the following:

- 5.a. Acts involving torture, genocide, or human trafficking? Yes No

- 5.b. Killing any person? Yes No

- 5.c. Severely injuring any person? Yes No

- 5.d. Any kind of sexual contact or relations with any person who was being forced or threatened? Yes No

6. Have you **EVER** recruited, enlisted, conscripted, or used any person to serve in or help an armed force or group while such person was under age 15? Yes No

7. Have you **EVER** used any person under age 15 to take part in hostilities, or to help or provide services to people in combat? Yes No

Part 5. Statement, Certification, Signature, and Contact Information of the Requestor *(For Initial and Renewal Requests)*

NOTE: Select the box for either **Item Number 1.a.** or **1.b.**

1.a. I can read and understand English, and have read and understand each and every question and instruction on this form, as well as my answer to each question.

1.b. The interpreter named in **Part 6.** has read to me each and every question and instruction on this form, as well as my answer to each question, in

a language in which I am fluent. I understand each and every question and instruction on this form as translated to me by my interpreter, and have provided true and correct responses in the language indicated above.

Requestor's Certification

I certify, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct and that copies of documents submitted are exact photocopies of unaltered original documents. I understand that I may be required to submit original documents to U.S. Citizenship and Immigration Services (USCIS) at a later date. I also understand that knowingly and willfully providing materially false information on this form is a federal felony punishable by a fine, imprisonment up to 5 years, or both, under 18 U.S.C. section 1001. Furthermore, I authorize the release of any information from my records that USCIS may need to reach a determination on my deferred action request.

2.a. Requestor's Signature

2.b. Date of Signature *(mm/dd/yyyy)* ▶

Requestor's Contact Information

3. Requestor's Daytime Telephone Number

4. Requestor's Mobile Telephone Number

5. Requestor's Email Address

Part 6. Contact Information, Certification, and Signature of the Interpreter *(For Initial and Renewal Requests)*

Interpreter's Full Name

Provide the following information concerning the interpreter:

1.a. Interpreter's Family Name *(Last Name)*

1.b. Interpreter's Given Name *(First Name)*

2. Interpreter's Business or Organization Name *(if any)*

Interpreter's Mailing Address

3.a. Street Number and Name

3.b. Apt. Ste. Flr.

3.c. City or Town

3.d. State **3.e.** ZIP Code

3.f. Province

3.g. Postal Code

3.h. Country

Interpreter's Contact Information

4. Interpreter's Daytime Telephone Number

5. Interpreter's Email Address

Part 6. Contact Information, Certification, and Signature of the Interpreter (For Initial and Renewal Requests) (continued)

Interpreter's Certification

I certify that:

I am fluent in English and which is the same language provided in **Part 5., Item Number 1.b.**;

I have read to this requestor each and every question and instruction on this form, as well as the answer to each question, in the language provided in **Part 5., Item Number 1.b.**; and

The requestor has informed me that he or she understands each and every instruction and question on the form, as well as the answer to each question.

6.a. Interpreter's Signature

6.b. Date of Signature (mm/dd/yyyy) ►

Part 7. Contact Information, Declaration, and Signature of the Person Preparing this Request, If Other than the Requestor (For Initial and Renewal Requests)

Preparer's Full Name

Provide the following information concerning the preparer:

1.a. Preparer's Family Name (Last Name)

1.b. Preparer's Given Name (First Name)

2. Preparer's Business or Organization Name

Preparer's Mailing Address

3.a. Street Number and Name

3.b. Apt. Ste. Flr.

3.c. City or Town

3.d. State 3.e. ZIP Code

3.f. Province

3.g. Postal Code

3.h. Country

Preparer's Contact Information

4. Preparer's Daytime Telephone Number

5. Preparer's Fax Number

6. Preparer's Email Address

Preparer's Declaration

I declare that I prepared this Form I-821D at the requestor's behest, and it is based on all the information of which I have knowledge.

7.a. Preparer's Signature

7.b. Date of Signature (mm/dd/yyyy) ►

NOTE: If you need extra space to complete any item within this request, see the next page for **Part 8. Additional Information.**

Part 8. Additional Information *(For Initial and Renewal Requests)*

If you need extra space to complete any item within this request, use the space below. You may also make copies of this page to complete and file with this request. Include your name and A-Number *(if any)* at the top of each sheet of paper; indicate the **Page Number**, **Part Number**, and **Item Number** to which your answer refers; and sign and date each sheet.

Full Legal Name

1.a. Family Name *(Last Name)*

1.b. Given Name *(First Name)*

1.c. Middle Name

2. A-Number *(if any)*
▶ A-

3.a. Page Number 3.b. Part Number 3.c. Item Number

3.d.

4.a. Page Number 4.b. Part Number 4.c. Item Number

4.d.

5.a. Page Number 5.b. Part Number 5.c. Item Number

5.d.

6.a. Signature

6.b. Date of Signature *(mm/dd/yyyy)* ▶

EXHIBIT H

Department of Homeland Security
U.S. Citizenship and Immigration Services

I-797, Notice of Action



RECEIPT NUMBER LIN-14-908-65497		CASE TYPE I821D CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS	
RECEIPT DATE July 18, 2014	PRIORITY DATE	APPLICANT [REDACTED]	
NOTICE DATE September 29, 2014	PAGE 1 of 1	LATTHIVONGSKORN, JIRAYUT	
JIRAYUT LATTHIVONGSKORN [REDACTED]		Notice Type: Approval Notice Valid from 09/26/2014 to 09/25/2016	

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at www.uscis.gov. There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

NEBRASKA SERVICE CENTER
U. S. CITIZENSHIP & IMMIG SERVICE
P.O. BOX 82521
LINCOLN NE 68501-2521
Customer Service Telephone: 800-375-5283



EXHIBIT J

Department of Homeland Security
U.S. Citizenship and Immigration Services

I-797, Notice of Action



Receipt Number IOE0900595945	USCIS Account Number [REDACTED]	Case Type I821D - CONSIDERATION OF DEFERRED ACTION FOR CHILDHOOD ARRIVALS
Receipt Date 04/26/2016	Priority Date 04/21/2016	Applicant [REDACTED]
Notice Date 01/13/2017	Page 1 of 1	JIRAYUT LATTTHIVONGSKORN

LATTTHIVONGSKORN, JIRAYUT
[REDACTED]

Notice Type: Approval Notice
Valid from: 01/13/2017 to 01/12/2019

Notice of Deferred Action:

This notice is to inform you regarding U.S. Citizenship and Immigration Services's (USCIS) decision on your Form I-821D, Consideration of Deferred Action for Childhood Arrivals.

USCIS, in the exercise of its prosecutorial discretion, has decided to defer action in your case. Deferred action is an exercise of prosecutorial discretion by USCIS not to pursue the removal of an individual from the United States for a specific period. Deferred action does not confer or alter any immigration status.

Unless terminated, this decision to defer removal action will remain in effect for 2 years from the date of this notice.

This form does not constitute employment authorization, nor may it be used in place of an Employment Authorization Document. The 90-day period for reviewing Form I-765, Application for Employment Authorization, filed together with Form I-821D begins as of the date of this approval notice. If Form I-765 is granted, you will receive your Employment Authorization Document separately by mail. Subsequent criminal activity after your case has been deferred is likely to result in termination of your deferred action. This notice does not provide permission to travel outside of the United States.

You are required to notify USCIS if you change your address. You may use the Alien's Change of Address Card, Form AR-11, to report a new address. That form may be found at www.uscis.gov. There is no fee for this change of address form.

NOTICE: USCIS and the U.S. Department of Homeland Security (DHS) reserve the right to verify the information submitted in this request and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of the verification will be used to determine whether termination of deferred action and/or removal proceedings are appropriate if, for example, the requestor committed fraud or misrepresentation in his or her request for consideration of deferred action for childhood arrivals, or engaged in subsequent criminal activity following the submission of his or her request. Individuals for whom removal action is deferred under Deferred Action for Childhood Arrivals may, in the sole discretion of USCIS and DHS, be provided an opportunity to address derogatory information before deferred action is terminated and/or removal proceedings are initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS/Nebraska Service Center
P.O. Box 82521
Lincoln NE 68501-2521

Customer Service Telephone: 800-375-5283



- *Please save this notice for your records. Please enclose a copy if you have to write us or a U. S. Consulate about this case, or if you file another application based on this decision.*
- *You will be notified separately about any other applications or petitions you have filed.*

Additional Information

GENERAL.

The filing of an application or petition does not in itself allow a person to enter the United States and does not confer any other right or benefit.

INQUIRIES.

You should contact the office listed on the reverse side of this notice if you have questions about the notice, or questions about the status of your application or petition. *We recommend you call.* However, if you write us, please enclose a copy of this notice with your letter.

APPROVAL OF NONIMMIGRANT PETITION.

Approval of a nonimmigrant petition means that the person for whom it was filed has been found eligible for the requested classification. If this notice indicated we are notifying a U.S. Consulate about the approval for the purpose of visa issuance, and you or the person you filed for have questions about visa issuance, please contact the appropriate U.S. Consulate directly.

APPROVAL OF AN IMMIGRANT PETITION.

Approval of an immigrant petition does not convey any right or status. The approved petition simply establishes a basis upon which the person you filed for can apply for an immigrant or fiance(e) visa or for adjustment of status.

A person is not guaranteed issuance of a visa or a grant of adjustment simply because this petition is approved. Those processes look at additional criteria.

If this notice indicates we have approved the immigrant petition you filed, and have forwarded it to the Department of State Immigrant Visa Processing Center, that office will contact the person you filed the petition for directly with information about visa issuance.

In addition to the information on the reverse of this notice, the instructions for the petition you filed provide additional information about processing after approval of the petition.

For more information about whether a person who is already in the U.S. can apply for adjustment of status, please see Form I-485, *Application to Register Permanent Residence or Adjust Status.*

EXHIBIT K

I-512L, Authorization for Parole of an Alien Into the United States

Department of Homeland Security
U.S. Citizenship and Immigration Services

(Family Name)	(Given Name)	(Middle Initial)	Date Issued	
LATTHIVONGSKORN, JIRAYUT			December 17, 2014	
			A# [REDACTED]	
Date of Birth (Month/Day/Year)	Country of Birth	(City or Town)	(State or Province)	(Country)
[REDACTED]	THAILAND			
U.S. Address (Apt number and/or in care of)		(Street Number and Name)	(City)	(State or Province) (Zip/Postal Code)
[REDACTED]				

TRAVEL AUTHORIZATION: Presentation of the original of this document authorizes a transportation line to accept the named bearer on board for travel to the United States without liability under section 273 of the Immigration and Nationality Act (INA) for bringing an alien who does not have a visa.

PAROLE: The named bearer of this authorization is an individual whose removal has been deferred under the Secretary of Homeland Security's June 15, 2012, memorandum authorizing Deferred Action for Childhood Arrivals (DACA). The named bearer departed the United States temporarily and intends to return to the United States. Presentation of the original of this document prior to January 22, 2015 allows a Customs and Border Protection (CBP) Inspector at a port-of-entry to parole the named bearer, whose photograph appears on this authorization, into the United States based on the parole authority contained in INA 212(d)(5)(A). **This authorization is valid for one request for parole during the validity period noted above.** Each parole period shall not exceed one day from the date of parole at the port-of-entry. **Please note:** this document does not guarantee that a person will be paroled into the United States. CBP has discretion to deny a request for parole.

NOTICE - READ BEFORE YOU TRAVEL ABROAD

Parole is not admission into the United States. Presentation of this authorization will allow a CBP Inspector at a port-of-entry to parole you into the United States. If CBP paroles you into the United States, your case will generally continue to be deferred. The deferral will continue until the date specified by USCIS or Immigration and Customs Enforcement (ICE) in your deferral notice or until the decision to defer removal action in your case has been terminated, whichever is earlier. Parole is not an "admission," so even while you are paroled you will remain an "applicant for admission." If you are found inadmissible, you will need to apply and qualify for a waiver of inadmissibility. If your waiver application is denied, you may be subject to removal proceedings as an inadmissible alien under 235(b)(1) or 240 of the Act. **Parole into the United States is not guaranteed.** In all cases, you are still subject to immigration inspection at a port-of-entry to determine whether you are eligible to come into the United States via the terms of this document. Even if you have previously been granted parole, the Department of Homeland Security retains discretion to deny you parole if the Department determines approving your parole application would not serve the public interest of the United States.

DHS can revoke or terminate your advance parole document at any time. If you are outside the United States when you are notified that DHS has revoked or terminated your advance parole document, the revocation or termination of your advance parole document may leave you unable to return to the United States unless you have a valid visa or other document that permits you to travel to the United States and seek admission. If you are in the United States when DHS revokes or terminates your parole, you will return to the status of an unparoled applicant for admission, and you may be subject to removal under INA section 212, rather than INA section 237.

Travel Warnings.
Leaving the United States, even with your advance parole document, may impact your ability to return to the United States.

If you have been ordered deported or removed, departing from the United States without having had your exclusion, deportation, or removal proceedings reopened and administratively closed or terminated will result in your being considered excluded, deported or removed, with potentially serious future immigration consequences, even if USCIS or ICE has deferred action in your case. If you have been unlawfully present in the United States, you may want to ask an immigration attorney or a representative at an immigrant assistance organization accredited by the Board of Immigration Appeals (BIA), whether leaving the United States would make you inadmissible and therefore ineligible for adjustment of status. Under section 212(a)(9)(B)(i) of the Act, aliens who depart the United States after being unlawfully present in the United States for certain periods may become subject to new or additional grounds of inadmissibility because of their travel abroad.

Inadmissibility in general. If you have concerns about admissibility and waivers you should contact an immigration attorney or an immigrant assistance organization accredited by the BIA before making foreign travel plans.


Mark Hazuda

Nebraska Service Center
850 S. Street
Lincoln, NE 68501

(Authorizing Office)
Parole Stamp

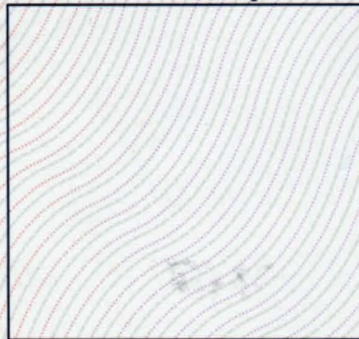
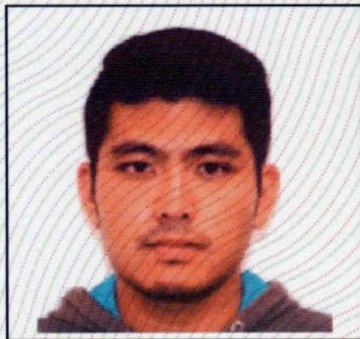


EXHIBIT 50

1 JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
2 COVINGTON & BURLING LLP
One Front Street, 35th Floor
3 San Francisco, CA 94111-5356
Telephone: (415) 591-6000
4 Facsimile: (415) 591-6091
Email: jdavids@cov.com,
5 abersin@cov.com
*Attorneys for Plaintiffs The Regents of the
6 University of California and Janet Napolitano, in
her official capacity as President of the
7 University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
9 JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
Los Angeles, CA 90071-3197
11 Telephone: (213) 229-7000
Facsimile: (213) 229-7520
12 Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
13 jgabriel@gibsondunn.com
*Attorneys for Plaintiffs Dulce Garcia, Miriam
14 Gonzalez Avila, Saul Jimenez Suarez, Viridiana
Chabolla Mendoza, Norma Ramirez, and Jirayut
15 Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
*Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
22 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
26 official capacity as Acting Secretary of the
Department of Homeland Security,

27 Defendants.
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CASE NO. 17-CV-05211-WHA

DECLARATION OF JULIE LEE

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, Julie Lee, declare and state as follows:

2 1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called
3 as a witness, I could and would testify competently thereto.

4 2. I am the Director of Operations for the California Governor's Office, a position I have held
5 since July 2013. In that capacity, I oversee executive compensation, out-of-state travel, and human
6 resource policies for state government. Prior to working as the Director of Operations, I was a manager
7 at the California Department of Human Resources, where I was in charge of government reorganization.

8 3. As of September 6, the State of California employs 48 DACA recipients. These individuals
9 are employed in a variety of capacities, including a firefighter, corporation examiner, a registered nurse,
10 and a psychiatric technician. These individuals work for at least 14 State agencies, including the
11 Department of Social Services, Department of State Hospitals, Department of Developmental Services,
12 and the Department of Corrections and Rehabilitation. Hiring these DACA recipients has helped to
13 directly advance the goals of a diversified workforce that reflects the population served by the state
14 workforce.

15 4. The vast majority of these employees are civil servants, which means they were required to
16 pass a competitive civil service examination. In addition to meeting minimum requirements for a
17 particular position, departments will often look to hire employees who have additional, desirable skills
18 that would be useful for a particular position, such as being multilingual, or having experience with a
19 particular underserved community.

20 5. In the event that Rescission is implemented and these individuals lose work authorization,
21 each of these agencies will lose the benefit of employing these individuals and the unique talents and
22 attributes they bring to State service. The loss of these valued employees will mean a loss of investment
23 and resources that went into their hiring and training, and will impact the productivity of these agencies.

24 6. In addition, these agencies will need to incur the administrative burden of terminating the
25 employment of these individuals when their work authorization expires and expending resources to find,
26 hire, and train replacement employees. The Governor's Office estimates that the average cost to replace
27 a State employee is \$15,000, which includes the amount of time necessary to post a vacancy, grade
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examinations, review applications, and interview potential candidates. The actual cost may be significantly higher for individual employees with unique skills and attributes.

7. In addition, the Governor's Office has heard from a number of DACA recipients outside of State employment who are concerned about the effect Rescission will have on educational and employment opportunities, as well as the possibility of enforcement. The Governor's Office has diverted staff time and resources to addressing these concerns.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on October 27, 2017 in Sacramento, California.



JULIE LEE

EXHIBIT 51

1 JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
2 COVINGTON & BURLING LLP
One Front Street, 35th Floor
3 San Francisco, CA 94111-5356
Telephone: (415) 591-6000
4 Facsimile: (415) 591-6091
Email: jdavids@cov.com,
5 abersin@cov.com
*Attorneys for Plaintiffs The Regents of the
6 University of California and Janet Napolitano, in
her official capacity as President of the
7 University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
9 JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
Los Angeles, CA 90071-3197
11 Telephone: (213) 229-7000
Facsimile: (213) 229-7520
12 Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
13 jgabriel@gibsondunn.com
*Attorneys for Plaintiffs Dulce Garcia, Miriam
14 Gonzalez Avila, Saul Jimenez Suarez, Viridiana
Chabolla Mendoza, Norma Ramirez, and Jirayut
15 Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSCHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
*Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
22 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
26 official capacity as Acting Secretary of the
Department of Homeland Security,

27 Defendants.

28 STATE OF CALIFORNIA, STATE OF

CASE NO. 17-CV-05211-WHA

DECLARATION OF LINDA LOPEZ

CASE NO. 17-CV-05235-WHA

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

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I, LINDA LOPEZ, DECLARE:

1. I have been the Chief of the Los Angeles Mayor’s Office of Immigrant Affairs (“MOIA”) since the office was reestablished in September of 2013. Mayor Eric Garcetti reestablished MOIA in order to promote and advance the economic, cultural, and social well-being of immigrant communities in Los Angeles. MOIA’s mission is to support immigrant integration through the coordination of city services, outreach, and legislative advocacy.

2. Since 2013, MOIA has been in contact with both the Los Angeles Field Office of USCIS as well as representatives of the USCIS intergovernmental team in Washington, D.C. regarding DACA. It is my understanding that, because Los Angeles had a high DACA-eligible population, USCIS made a concerted effort to work with MOIA to provide information and materials about the program that MOIA could pass along to the local immigrant population. MOIA also participates in monthly calls with USCIS regarding various immigration issues, including DACA.

3. Since 2013, MOIA has held twenty separate clinics to help eligible people apply for DACA. Several of these events were co-hosted by MOIA and community-based organizations. The information provided at these events included information about how and when to renew DACA applications.

4. Since the decision to rescind DACA was announced on September 5, 2017, MOIA expended resources in the form of hosting four DACA renewal clinics to assist eligible applicants before the October 5, 2017 deadline. But for the decision to rescind the DACA program, MOIA would not have expended these resources on DACA renewal clinics.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 30, 2017.



Linda Lopez

EXHIBIT 52

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: j davidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

14 THEODORE J. BOUTROUS, JR. (SBN 132099)
15 ETHAN D. DETTMER (SBN 196046)
16 JESSE S. GABRIEL (SBN 263137)
17 GIBSON, DUNN & CRUTCHER LLP
18 333 South Grand Avenue
19 Los Angeles, CA 90071-3197
20 Telephone: (213) 229-7000
21 Facsimile: (213) 229-7520
22 Email: tboutrous@gibsondunn.com,
23 edettmer@gibsondunn.com,
24 jgabriel@gibsondunn.com
25 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
26 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
27 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
28 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF PAUL LORENZ

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, PAUL LORENZ, declare:

2 1. I am a resident of the State of California. I have personal knowledge of the facts set forth
3 in this declaration. If called as a witness, I could and would testify competently to the matters set forth
4 herein.

5 2. I am the Chief Executive Officer of Santa Clara Valley Medical Center ("SCVMC"),
6 which is owned and operated by the County of Santa Clara ("the County"). I have held this position
7 since November, 2012. Prior to my current role at SCVMC, I served as the Chief Deputy Director of the
8 Ventura County Health Care Agency for the County of Ventura. I have served in public health care for
9 over 25 years.

10 3. SCVMC was founded in 1876 and is a fully integrated and comprehensive public health
11 care delivery system. It provides critical healthcare to residents of the County regardless of their ability
12 to pay. It is the only public safety net healthcare provider in Santa Clara County, and the second largest
13 such provider in the State of California. Generally, safety net providers like SCVMC have a primary
14 mission to care for the indigent population and individuals who are uninsured or underinsured, or on
15 Medicaid, which is the federal healthcare insurance program for low income individuals.

16 4. SCVMC operates a 574-bed tertiary care hospital, eleven ambulatory care clinics, and four
17 medical and dental units, along with specialized centers that provide trauma, burn, rehabilitation, renal,
18 and ambulatory care. It has over 6,000 employees, including 350 physicians who train 170 residents and
19 fellows per year as a graduate medical education provider and teaching institution. SCVMC is a Level
20 1 Adult Trauma Center and Level 2 Pediatric Trauma Center. Its burn and rehabilitation centers have
21 been nationally recognized, and its ambulatory specialty center, renal care center, and acute inpatient
22 psychiatric unit are state of the art. SCVMC provides a full range of health services, including
23 emergency and urgent care, ambulatory care, behavioral health, comprehensive adult and pediatric
24 specialty services, the highest-level neonatal intensive pediatric care unit, women's health,
25 comprehensive hematology/oncology services, and other critical health care services for all residents of
26 Santa Clara County, regardless of their ability to pay.
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1 5. SCVMC provides the vast majority of the healthcare services in the County that are
 2 available to poor and underserved patients. In fiscal year 2016, there were nearly 800,000 outpatient
 3 visits to SCVMC's primary care, express care, specialty clinics, and emergency department, and nearly
 4 125,000 days of inpatient stays in the hospital. Patients who are uninsured, reliant on California's
 5 Medicaid program (Medi-Cal), or on Medicare, which is the federal insurance program for elderly and
 6 disabled individuals, were responsible for approximately 90% of outpatient visits and approximately
 7 87% of inpatient days.

8 6. If Deferred Action for Childhood Arrivals (DACA) recipients lose their legal status due to
 9 the rescission of the DACA program, they may be less likely to seek and receive essential services like
 10 health care. Some SCVMC patients may choose to forgo routine or preventative health care and only
 11 seek health care when they experience emergencies. Such patients could easily increase SCVMC's
 12 costs as a public safety net healthcare provider, as it is well-known in the health care industry that
 13 emergency care is much costlier to provide than routine or preventative care.¹ Still other SCVMC
 14 patients may choose to forgo necessary health care services altogether. Under either scenario, health
 15 outcomes for some of the County's most vulnerable residents would certainly decline.

16 7. If DACA recipients who have employer-sponsored health insurance have additional
 17 uncertainty as they contemplate the future loss of work authorizations and thus the employment through
 18 which they receive insurance, that uncertainty could pose an additional hurdle for them and family
 19 members who would otherwise seek routine and preventative health care at SCVMC. If they are unable
 20 to obtain or keep health insurance, these individuals would likely join SCVMC's uninsured population
 21 when they do seek care at SCVMC, thus increasing SCVMC's costs.

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 26 ¹ E.g., Elaine Cox, "Why Do We Continue Using the ER for Care?" US News and World Report, at
 27 [https://health.usnews.com/health-news/patient-advice/articles/2015-12-14/why-do-we-continue-using-](https://health.usnews.com/health-news/patient-advice/articles/2015-12-14/why-do-we-continue-using-the-er-for-care)
 28 [the-er-for-care](https://health.usnews.com/health-news/patient-advice/articles/2015-12-14/why-do-we-continue-using-the-er-for-care) (last accessed October 25, 2017).

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on October 27, 2017 in San José, California.



PAUL E. LORENZ

EXHIBIT 53

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: j davidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
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11 GIBSON, DUNN & CRUTCHER LLP
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13 Los Angeles, CA 90071-3197
14 Telephone: (213) 229-7000
15 Facsimile: (213) 229-7520
16 Email: tboutrous@gibsondunn.com,
17 edettmer@gibsondunn.com,
18 jgabriel@gibsondunn.com
19 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
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XAVIER BECERRA
Attorney General of California
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Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
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P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
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Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
26 SECURITY and ELAINE DUKE, in her
27 official capacity as Acting Secretary of the
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

**DECLARATION OF DR. CATHERINE
LUCEY**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, CATHERINE LUCEY, DECLARE:

2 1. I am the Vice Dean of the University of California San Francisco School of Medicine
3 (“UCSF”). The matters set forth herein are true and correct of my own personal knowledge and, if called
4 as a witness, I could and would testify competently thereto.

5 2. I direct the UCSF graduate, undergraduate, and continuing medical education programs.
6 This includes responsibility for medical student education and medical residency programs.

7 3. UCSF is a leading institution dedicated to advancing health worldwide through advanced
8 biomedical research, graduate-level education in the life sciences and health professions, and excellence
9 in patient care. Our mission is to advance human health through education, research, patient care, and
10 public service. To fulfill our mission, UCSF is committed to training physicians from all backgrounds
11 and cultures, and to developing a diverse community in all training programs.

12 4. I understand that there are approximately twelve DACA recipients who are currently
13 health professional students (medical, dental, pharmacy or nursing) across the University of California
14 Health system (“UC Health”), including students at UCSF. UCSF has one fourth year medical student
15 and one first year medical student who are DACA recipients.

16 5. Admission to our medical school is extraordinarily competitive. Less than 5% of
17 applicants are admitted in an average year, and those admitted have exceptionally high grade point
18 averages (both generally and in science courses specifically) and scores on standardized tests. For the
19 2017 class, for example, we received 8,078 applicants for a class of 145 students. Our DACA students
20 gained admission to UCSF because of their individual records of high achievement. For example, our
21 fourth year DACA recipient is among the top of his class academically and has emerged as a leader in
22 catalyzing his peers and faculty to address the public health needs of immigrant and other vulnerable
23 populations. He was awarded an Excellence in Public Health Service award in April of this year from
24 the U.S. Public Health Service.

25 **Immediate Harm to Medical Students from the DACA Rescission**

26 6. The announced rescission of the DACA policy threatens serious harm to DACA-recipient
27 fourth-year medical students at UC Health who are trying to obtain residency positions. Medical
28 residency positions require employment authorization. The rescission of the DACA policy is causing

1 uncertainty around their DACA employment authorization, and therefore jeopardizing the only chance
2 these students have to obtain a residency position and to complete their residency.

3 7. Medical students must complete a residency program to become fully-licensed
4 physicians. Medical residency is a three to eight year process. Upon graduation, approximately 98% of
5 UCSF students go into residency programs.

6 8. Employment authorization is required at the outset and for the duration of all residency
7 programs. This is because medical residents actively practice medicine in a clinical setting and care for
8 patients. Residents serve as a critically important workforce for all academic hospitals. They care for
9 patients as employees while they simultaneously learn as residents. Work authorization is thus essential
10 for residents throughout their residency.

11 9. Physician graduates of American medical schools, including UCSF Medicine, are not
12 eligible for a medical license until they have completed at least one year of residency training. Without a
13 residency position, UC Health medical school graduates cannot practice medicine in the United States.

14 10. The matching to residency programs for all medical residency positions in the United
15 States will occur in mid-February through to mid-March 2018. Residency matching therefore coincides
16 with the March 5, 2018 end of the DACA program and the expiration of any DACA status for which
17 renewal is not granted before then. Matching between residency positions and interested students is open
18 exclusively to fourth-year medical students. These students are already beginning to collect materials in
19 anticipation of the registration process for matching.

20 11. The process of matching students to residency position is highly controlled by the
21 National Residency Matching Program (NRMP) for all 146 medical schools and every residency
22 position in the United States. The NRMP matching process fills virtually every available residency spot
23 in the country. It becomes almost impossible to obtain a desirable residency position after the matching
24 process ends. The matching process therefore represents our students' only realistic chance to become
25 medical residents, and consequently, their only realistic chance to become physicians.

26 12. The announced rescission of the DACA policy has created great hesitancy among
27 residency programs as to whether to accept otherwise highly-qualified DACA students as matches.
28 Students indicate their DACA status on their application to the NRMP for matching and each residency

1 program has the discretion to accept or refuse to consider DACA candidates. I am not aware of any
2 guidance from the NRMP on whether programs should accept DACA candidates.

3 13. Residency programs at UCSF and, as I understand it, in other locations across the United
4 States are concerned that if they accept DACA recipients as matches, that resident will be unable to start
5 or complete their residency because they will lose their work authorization. This is a very real worry;
6 residencies are three to eight years and the rescission of DACA means DACA students' work
7 authorizations will expire during this period. The hesitancy to accept DACA recipients as residents is
8 understandable, as it would be difficult for a school to replace a trained resident with another qualified
9 candidate partway through a residency program. Such programs are often specialized in particular areas
10 of healthcare. This uncertainty over DACA student employment authorization is making it less likely
11 that UCSF DACA students will obtain residency positions, which they would have otherwise obtained if
12 the DACA policy continued.

13 14. This predicament also means our DACA students are considering self-selecting out of
14 their one-time opportunity to participate in the residency match program. Our students understand that it
15 is an exceptionally serious commitment to accept any matched residency position. It is an ethical and
16 legal commitment to carry out the care of patients in the position for which they are matched. To break a
17 match once it is made, the students would have to obtain a waiver from the NRMP. Students who obtain
18 a waiver are then viewed as high-risk candidates for any future positions. Residency positions are
19 already rarely available after the matching occurs; high-risk candidates with waivers are even less likely
20 to obtain these rare positions.

21 15. The uncertainty of their employment status puts at risk our DACA students' ability to
22 practice medicine in the United States, which in turn threatens their current and future investment in
23 their medical education. UC Health medical students invest significantly in their education, graduating
24 with median student loans totaling approximately \$154,000. The students have taken on this debt with
25 the expectation that they will be able to rely on DACA to become practicing physicians, with the ability
26 to earn an income commensurate with that investment. The rescission of DACA puts in serious jeopardy
27 the students' investment.
28

1 16. Finally, the rescission of DACA will leave our DACA students unable to train in
2 Veterans Affairs hospitals (the “VA healthcare system”). The VA healthcare system is an extremely
3 significant training resource for UCSF students. The VA has high-quality, integrated community care
4 and training facilities that serve as an invaluable part of our mission to educate modern physicians. All
5 UCSF students and one-third of UCSF’s residents train in the VA healthcare system.

6 17. The rescission of the DACA policy means our DACA students will no longer be able to
7 train in the VA healthcare system, which requires authorization to work lawfully in the United States.
8 This will be a significant loss of opportunity for our DACA students. It will be extremely difficult and
9 costly for UCSF to replicate the training DACA students would have received if they can no longer
10 work in the VA healthcare system.

11 **Harms to UCSF School of Medicine and California Communities from the DACA Rescission**

12 18. The DACA rescission threatens significant harm to UCSF and UC Health. We estimate
13 that UC Health invests approximately \$70,000 per year in each students’ medical education, which is 4-
14 years. If our students do not secure residency positions, our significant investment in their education
15 and training is lost. This impacts UCSF’s ability to achieve its mission of advancing human health
16 through education and patient care, because the students will not go on to become practicing physicians
17 in the United States.

18 19. UCSF is preparing physician-leaders who are expected to make significant contributions
19 to healthcare, medicine, and science in their careers. Accordingly, we invest significant financial
20 resources in all of our students, including our DACA students. Student tuition provides less than 50% of
21 the resources required to educate our medical students. UCSF absorbs the remaining cost of student
22 education. The financial commitment to educate a single medical student represents a long-term
23 investment in that student’s success, since it can take 10 years or more for a medical doctor to complete
24 all of his or her training. The attrition rate at UCSF is historically very low, and most of our students
25 obtain residency positions, so our DACA students are otherwise likely to complete their education. If
26 medical students leave UCSF before completing their program, or are unable to become physicians
27 because of the rescission of the DACA policy, our investment in them is lost.

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20. The rescission of the DACA policy threatens the diverse community of students, residents and fellows that is a key ingredient to the groundbreaking life sciences research and world-class healthcare UCSF strives to deliver. Increasing the diversity of the physician workforce increases the quality of care for diverse populations like those in California. Ample literature documents that language and culture concordance between doctors and their patients increases adherence to medical recommendations and improved health outcomes. Students from diverse and immigrant backgrounds are also more likely to practice in medically underserved areas. The UCSF students from minority and immigrant backgrounds, as our DACA students are, are approximately twice as likely to practice in underserved geographic areas and in underserved specialties, such as primary care, general surgery, general psychiatry, where the need for physicians is most dire. Diverse students like our DACA students are therefore essential to delivering the healthcare services California needs most.

21. UCSF takes seriously our responsibility to heal and provide highly-skilled medical care to our communities and train the next generation of physicians. The DACA rescission deprives our DACA students of their well-earned opportunities to become residents and doctors. It is also impairing UCSF's ability to deliver the high-quality care our patients currently need and the next generation of California's physicians. The DACA rescission is harming and will continue to harm UCSF School of Medicine and our DACA students.

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

Executed on October 27, 2017 in San Francisco, California.


CATHERINE LUCEY

EXHIBIT 54

1 JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
2 COVINGTON & BURLING LLP
One Front Street, 35th Floor
3 San Francisco, CA 94111-5356
Telephone: (415) 591-6000
4 Facsimile: (415) 591-6091
Email: j davidson@cov.com,
5 abersin@cov.com
*Attorneys for Plaintiffs The Regents of the
6 University of California and Janet Napolitano, in
her official capacity as President of the
7 University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
9 JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
Los Angeles, CA 90071-3197
11 Telephone: (213) 229-7000
Facsimile: (213) 229-7520
12 Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
13 jgabriel@gibsondunn.com
*Attorneys for Plaintiffs Dulce Garcia, Miriam
14 Gonzalez Avila, Saul Jimenez Suarez, Viridiana
Chabolla Mendoza, Norma Ramirez, and Jirayut
15 Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
*Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
University of California,
23
Plaintiffs,
24
v.
25 U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
26 official capacity as Acting Secretary of the
Department of Homeland Security,
27
Defendants.

CASE NO. 17-CV-05211-WHA
DECLARATION OF ZULMA MACIEL
Date: December 20, 2017
Time: 8:00 a.m.
Judge: Honorable William Alsup
Dept.: Courtroom 8
Complaint Filed: September 14, 2017
Trial Date: February 05, 2018

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STATE OF CALIFORNIA, STATE OF
MAINE, STATE OF MARYLAND, and
STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security, and the UNITED
STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, ELAINE C.
DUKE, in her official capacity, and the
UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ
AVILA, SAUL JIMENEZ SUAREZ,
VIRIDIANA CHABOLLA MENDOZA,
NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD
J. TRUMP, in his official capacity as President
of the United States, U.S. DEPARTMENT OF
HOMELAND SECURITY, and ELAINE
DUKE, in her official capacity as Acting
Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

CASE NO. 17-CV-05813-WHA

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

I, ZULMA MACIEL, declare and state as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.

2. I am currently the Assistant to the City Manager of the City of San Jose, California (“San Jose”) and lead the Strategic Partnerships and Office of Immigrant Affairs. I have over 20 years of prior public administration experience. I have a Bachelor of Arts degree from the University of California, Santa Cruz.

3. The City of San Jose has devoted significant resources to the cultivation of productive relationships between government and immigrant communities. In my role as head of the Office of Immigrant Affairs, I have been responsible for organizing and implementing many of these efforts.

4. The City’s Office Immigrant Affairs was established in 2015 to coordinate a comprehensive local response to President Obama’s Deferred Action on Childhood for Childhood Arrivals (“DACA”) executive order. The Office’s purpose is to facilitate immigrant integration, maximize potential benefits created by recent immigration action, promote mutual respect and cooperation between immigrants and U.S.-born residents, and create policies that make it easier for immigrants to participate fully in civic, cultural, and economic life. As head of the Office of Immigrant Affairs, I aim to create a more informed, engaged, and welcoming experience for immigrants, increase

1 opportunities for shared prosperity among all City residents, and help San Jose become the most
2 successful multicultural city in the world.

3 5. Also in conjunction with my leadership role with the Office of Immigrant Affairs, I have
4 been responsible specifically for communicating with the County of Santa Clara (in which San Jose is
5 situated) and community-based organizations about the DACA program and its effects on San Jose
6 residents.

7 6. The City Manager's Office and Office of Immigrant Affairs worked representatives from
8 multiple sectors and community members to develop the "Welcoming San Jose Immigrant Integration
9 Plan," which was approved by the Mayor and City Council in October 2016. This three-year immigrant-
10 integration plan recommends goals and objectives to create a more welcoming environment and improve
11 the quality of life for immigrants. Given immigrants' central role in communities throughout San Jose,
12 the City has devoted extensive time and resources to helping disenfranchised immigrants gain a stronger
13 social and economic foothold and contribute more fully to our economy and the communities in which
14 they live and work, without living in fear. A true and correct copy of the Office of Immigrant Affairs's
15 Welcoming San Jose Immigrant Integration Plan—which includes the full mission statement of the
16 Office, the Council Resolution creating it, statistics on San Jose, and specific welcoming messages to
17 new immigrants from both the Mayor and City Manager of San Jose—is attached hereto as Exhibit A.

18 7. Among the specific programs the City has implemented through its Office of Immigrant
19 Affairs are translation and interpretation services; customer service training that includes particular
20 training on cultural competency; and civic engagement among Limited English Proficient residents.

21 8. The City of San Jose has allocated \$250,000 for the specific purpose of funding the
22 initiatives of the Welcoming San Jose Immigrant Integration Plan.

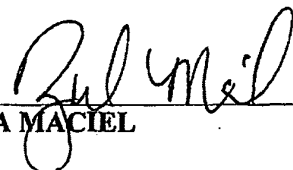
23 9. I have interacted directly with members of the immigrant community, including DACA
24 recipients, in my capacity as head of the Office of Immigrant Affairs. These interactions have taken
25 place in a variety of settings, the most prominent of which have been community forums and small
26 group meetings my office has had with immigrant residents. Rescission of DACA has caused significant
27 fear, uncertainty and other negative impacts among its recipients and their family members in San Jose.
28 The rescission affects not only DACA recipients and their families, but also the very communities to

1 which they contribute so much. Having relied on the work and other social and economic contributions
2 of DACA recipients, San Jose suffers clear and severe losses from the rescission and the harm it causes
3 to its city employees.

4 10. It is my judgment and experience based on years of interaction with immigrant
5 communities within San Jose that protecting these young people from removal would allow them to live
6 productive lives and to further enrich themselves, their families, and their adopted country as vital parts
7 of our community. The City of San Jose recognizes their important contributions and through its actions
8 and ideals aims to demonstrate that it is a welcoming community that truly values diversity. That is the
9 central mission of the Office of Immigrant Affairs.

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I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on October 26, 2017 at San Jose, California.



ZULMA MACIEL

EXHIBIT A



Welcoming San José

Plan for Civic, Economic, Linguistic, and Social Integration 2016-2019





Dear Resident,

As Mayor of San José, it gives me great pleasure to support our City's efforts to be a more welcoming, inclusive city that works for all of our residents. As the descendant of immigrants, I know firsthand the earnestness and heart that immigrants bring to this country, and the ways in which they serve their new communities by helping them grow all the more.



For this and many reasons, I am happy that our Office of Immigrant Affairs is seeking to recognize the inherent talents and hardworking spirit of immigrants from all racial, ethnic, socioeconomic, and religious backgrounds. We, the people of San José, together with our Office of Immigrant Affairs, continue to welcome immigrants to our city, and foster a truly caring environment. I welcome everybody to continue to engage in the work of making our City safer, smarter, and more welcoming to all who live here.

I offer my sincere congratulations to the Welcoming San José committee for their continued work in opening the doors of San José for all immigrants who wish to make a home here and contribute to our community.

Regards,

A handwritten signature in black ink that reads "Sam Liccardo".

Sam Liccardo
Mayor



Dear Resident,

As an immigrant to the United States myself, I have a deep and personal appreciation of the challenges of joining a new society, the opportunities that exist in America, and the contributions that immigrants make that enrich our communities.



I also have profound respect for the courage and talents of immigrants to our community, for I know it is not an easy transition. The San José Office of Immigrant Affairs is leading our efforts and working with our entire community and our many partners to help make San José a better city for all our residents.

The City of San José understands that our neighborhoods and our businesses gain so much from what immigrants bring: their energy, their skills, and their perspectives that strengthen the vitality of our city. For this reason, I am very proud that San José is a welcoming city that supports vigorous efforts to help our newest residents from other lands get settled quickly and warmly.

On behalf of the City and our residents, welcome to San José!

Norberto Dueñas
City Manager

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12	Member Roles/Acknowledgement
13	Steering Committee Members
15	San José Office of Immigrant Affairs
16	Goals & Strategies
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24	Appendix B



Executive Summary



According to San José’s Mayor Sam Liccardo, “We are a city of immigrants; this is a critical thread to our DNA... it is our secret sauce. If we are going to compete in a global marketplace, we need to all be working together.”

As of 2014, more than 38% of San José’s population are immigrants. Immigrants in Silicon Valley have high rates of workforce participation and large tax contributions, including an estimated \$77 billion immigrant contribution to the county’s economy. At the same time, many also struggle in areas such as education, economic opportunity, and equitable access to services and engagement.

The City of San José is committed to building a more vibrant and welcoming city by engaging in a dynamic,



intentional immigrant integration process in which our immigrant communities and our receiving communities

work together and in which the City of San José works to make City services accessible and relevant for all residents, including the 38% who are recent immigrants.

To this end, the City of San José completed an 8-month process to develop a three-year immigrant integration plan, intended to build upon the powerful strengths and contributions of the immigrant community and to connect the immigrant community, the receiving community, community partners, and local government.

The comprehensive planning process included a Steering Committee composed of local government partners, including representatives from multiple





City departments, the County Office of Immigrant Relations, and key community, business, and education partners. These individuals, as representatives of their respective organizations, served the critical role of leading the development of a three-year Welcoming San José Plan that recommends strategies and practices to create a more welcoming environment and improve the quality of life of immigrants.

The following **five key areas** and their respective goals serve as the framework for the Welcoming San José Plan. Detailed recommendations and strategies for each of the key areas are outlined on pages 16 to 21:

- **Leadership and Communications:** Establish immigrant friendly policies, programs, and practices

throughout the City that create an inclusive and welcoming environment for immigrants who live, work and visit the City.

- **Access and Engagement:** Improve immigrant access to City services and increase immigrant participation in civic life.
- **Education:** Help immigrant students and families actively participate and succeed in the education system, by engaging as a change agent and collaborating partner.
- **Economic Opportunity:** Expand economic opportunity for immigrants by helping immigrants improve job skills, growing immigrant small businesses, and generating employment opportunities.
- **Safe, Healthy and Connected Communities:** Foster trust and build relationships between immigrants and law enforcement, local government and the community at large, and create opportunities for quality connections and healthy living.

With approval of the Mayor and City Council, the City Manager, the Office of Immigrant Affairs, and the City as a whole are excited to begin implementation of the Welcoming San José Plan to further strengthen and build upon the contributions of our immigrant community members.



Background

TODAY, 1 IN 4 CHILDREN IN THE U.S. IS AN IMMIGRANT OR CHILD OF IMMIGRANTS. When communities extend the ladder of opportunity to these youth and their families, build bridges between newcomers and long-term residents, and create a culture rooted in our foundational American values of inclusiveness, we forge the next generation of leaders and shape a more prosperous and inclusive future for all Americans.

San José is the U.S. metro area with one of the highest concentration of immigrants. As of 2013, foreign-born individuals comprised about 38 percent of San José's population, while immigrants comprised 27 percent of California's population and 13 percent for the United States population as a whole. If a San José resident was not born in a foreign country, it is likely that they have immigrant relatives; about 60 percent of Santa Clara County residents have at least one immigrant parent, and 43 percent of households are headed by an immigrant.

Forward-thinking communities around the country are recognizing that being welcoming to immigrants makes them more economically competitive and also makes them vibrant places for all residents to live, work, and play. In recent years, local city governments across the U.S. have taken increased ownership around immigrant integration. The City of San José recognizes that immigrant inclusion is good for community well-being and prosperity. As a result, the City established a new Office of Immigrant Affairs (OIA) that will play an important role in facilitating immigrant integration by creating policies or programs that make it easier for immigrants to fully participate in civic, economic, and social life. The OIA's role is to:

1. Convene
2. Educate
3. Advocate
4. Coordinate among City departments
5. Collaborate across multiple jurisdictions
6. Leverage resources
7. Bridge between immigrant community and City

Since its inception, the new San José OIA has worked



to leverage opportunities and resources to maximize the impact, increase the visibility, and further define the scope and role of the Office.

In September 2015, the Mayor and City Council adopted a Welcoming San José Resolution, Appendix A, that described guiding principles for making San José a more welcoming and inclusive place for all residents. That same week, the Office of Immigrant Affairs hosted the first meeting of the Welcoming San José Steering Committee charged with developing a three-year



San José City Manager Norberto Dueñas expressed his experience as an immigrant during opening remarks at the White House Convening (April 2016).

immigrant integration plan. The Committee was composed of a cross-sector group of individuals committed to the work, who contributed varied experiences and are highly knowledgeable of the diverse communities in San José. The Steering Committee provided input on the strategies that will create a more inclusive community; led or participated in sub-committee discussions on specific topic areas; and worked towards obtaining community representation in the Welcoming San José Plan.

NATIONAL WELCOMING MOVEMENT

The City of San José became a member of and received technical assistance from **Welcoming America**, a national organization leading the movement to create more inclusive communities. San José also partnered with the **White House — Building Welcoming Communities Campaign, Cities for Action, and Cities for Citizenship Campaign**. As a result of active participation in these networks and successful progress made on developing the WSJ Plan, San José benefitted from national attention. The White House selected ten cities from across the nation to co-host a convening to discuss immigrant integration strategies and San José was one of those

cities honored with the opportunity to bring together over 100 partners from federal departments to local non-profit organizations.

Furthermore, the City earned a *Gateways for Growth* Challenge Grant from **Partnership for a New American Economy (PNAE)** that resulted in a research brief "*New Americans in San José and Santa Clara County*," Appendix B. The data reveals that Santa Clara County's 1.9 million immigrant residents—who account for roughly 38 percent of the area's population—positively impact the local economy through their high rates of workforce participation, large tax contributions, and spending power.

In addition, OIA was awarded 2 Welcoming Communities AmeriCorps VISTAs from **Welcoming America** and **Public Allies** that will support the OIA's implementation of key elements of the *Welcoming SJ* Plan.

SAN JOSE: AN IMMIGRANT GATEWAY

San José has been a long-standing immigrant gateway, from the colonization period, to early Irish, Portuguese and





Community members discuss strategies to create a safe, healthy, and connected community.

Italian settlers, to Mexican, Vietnamese, Cambodian, Chinese, Filipino, and Indian immigrants, and more recently Ethiopian, Eritrean, and Somali immigrants.

However, the immigrant experience in San José is varied. It is largely contingent on the circumstances that brought an immigrant to the city or region. On one side of the spectrum, there are high-skilled workers from a foreign country that migrate here in response to hiring offers upon completion of graduate level education in the United States, or to contractor labor pools initiated by employers. They are greeted by private companies, protected by a worker visa, merged into the professional world of Silicon Valley, and are offered assistance to seek housing. In general, integration into U.S. life is naturally accelerated via good employment and a network of support. The challenges they face are related to social and cultural adjustments and H1-B visa challenges (temporary work permits). However, as a result of visa-related barriers, it is estimated that 70% of high-skilled workers in the region are burying their ideas. According to Manan Mehta of Unshackled.com, 50% of those surveyed would consider moving back to their countries of origin to develop their ideas. This implies that without comprehensive immigration reform, Silicon Valley will lose talent, ideas, and opportunities to further advance innovation.

There is also a group of immigrants and refugees who are in the U.S. as a result of forced migration; many fleeing violence and persecution in their country of origin and who have been granted asylum or legal permanent resident status to those who fear losing their basic human rights upon returning to his or her home country. While federal, state, and local resettlement services are available to them, the transition to a new community presents many challenges, such as language barriers, understanding of social norms, and trauma. The skill level ranges amongst refugees, however, many arrive having already completed extensive education and job training, or with significant work experience abroad. While about one-third of all immigrants have college degrees, representing over 15% of all college-educated individuals in the U.S. workforce, they are disproportionately likely to be unemployed or underemployed. Language barriers, lack of access to job networks, variability in credit for their prior learning, and other challenges with the certification and licensing processes can all contribute to under- or unemployment for skilled immigrants.

Perhaps the group of immigrants that face the most challenges are the undocumented, manual laborers, and those who fled their countries due to poverty and violence. Prominent issues encountered by this group of immigrants are language barriers, fear of deporta-





San José Police Chief, Eddie Garcia, having a dialogue with students.

tion, low wages, wage theft, poverty, lack of housing options, distrust for institutions, unfamiliarity with the education system, and discrimination. While the WSJ Plan recommends strategies to create a more welcoming city — one that embraces all new immigrants — it **addresses the challenges of the most vulnerable and underserved in our community, recognizing that race and class are persistent barriers to a more equitable quality of life.**

SHARED LEADERSHIP

The three-year WSJ Plan is an ambitious guide that will create a more informed, diverse, and welcoming experience for immigrants throughout our city; increase opportunities for shared prosperity; increase civic engagement by all community members; and aim at becoming the most successful multi-cultural city in the world. The implementation will require strategic multi-sector collaborations with community-based

organizations, community (both receiving community and foreign-born), schools, local community colleges and universities, business sector, local governments, and faith-based organizations. It will require:

- Partnerships that leverage assets and resources
- Adjustments to service models that serve and engage the immigrant community to enable greater efficiencies and effectiveness



- Investments in language access, civic leadership and engagement, cultural competency and awareness, tools to navigate City services and community resources, and staffing to manage, guide, monitor, and engage with multiple key stakeholders.

The City of San José values its diversity and embraces immigrants and their contributions to our city. Now more than ever, it is critical that the City work with nonprofit partners, schools, the community, business sector, and other institutions to support immigrants who have chosen to call San José home. The OIA will continue to be an active participant in national networks that strive to create more welcoming and inclusive communities

COMMUNITY-DRIVEN PROCESS

The Welcoming San José planning method was a community-driven process with a range of informed perspectives and opportunities for input. A combination of Steering Committee and Sub-Committee insights, focus groups, community forum, small group meetings, and the expertise of our community partners have valuably informed the WSJ Plan.

- Seven Steering Committee meetings
- Five Sub-committees; 25 meetings; 77 key stakeholders on behalf of 44 organizations
- 17 focus groups were conducted on behalf of 11 partnering organizations; 163 participants
- Eight additional meetings were organized that involved the following communities: Eritrean, Ethiopian, Muslim, Persian, and Vietnamese.



Through the Licencias Project, adults are preparing for the AB 60 License exam.

WELCOMING SJ PLAN

Member Roles

Steering Committee

Objective: To develop a three-year *Welcoming San José* Plan that will recommend strategies and practices that will create a more welcoming environment and improve the quality of life of immigrants.

Steering Committee members participated in monthly meetings and provided input on the strategies that will create a more inclusive community; lead sub-committee discussions on specific topic areas; and ensured stakeholder/community voice was represented.



The 29-person WSJ Steering Committee participated in seven planning sessions.



Five Sub-committees were formed, 77 participants, representing 44 organizations that contributed to the plan's development.

Sub-committees

Objective: To recommend strategies and practices that will facilitate the integration of immigrants in San José per the topic areas and coordinate focus groups.

1. *Leadership and Communications*
2. *Equitable Access*
3. *Economic Opportunities and Education*
4. *Civic Engagement*
5. *Safe, Healthy, and Connected Communities*

WELCOMING SJ PLAN

Steering Committee Members

Acknowledgement

We are grateful to the following people and the organizations they represent for their time, energy and insight. Without their contributions, charting a successful course toward advancing linguistic, civic, economic, and social integration would not be possible.

Local Government Partners

City of San José, City Manager’s Office	Norberto Dueñas, Julie Edmonds-Mares, Zulma Maciel
City of San José, Office of Economic Development	Kim Welsh, Jeff Ruster
City of San José, Housing Department	Jacky Morales-Ferrand
City of San José, Library Department	Jill Bourne, Heidi Dolamore
City of San José, Parks, Recreational and Neighborhood Services	Angel Rios
City of San José, Police Department	Anthony Mata
County of Santa Clara, District Attorney’s Office	Josue Fuentes
County of Santa Clara, Office of Cultural Competency	Arcel Blume
County of Santa Clara, Office of Immigrant Relations	Maria Love

Community Partners

Asian Americans for Community Involvement	Michele Lew
FWD.us	Katie Aragón
Heising-Simons Foundation	Chhandasi Pandya Patel
Institute for Local Government	Mahvash Hassan, Sarah Rubin
Mexican Consulate	Nuria Marine
People Acting in Community Together (PACT)	Akemi Flynn
Sacred Heart Community Service	Poncho Guevara
San José City College	Jorge Escobar
Services, Immigrant Rights and Education Network (SIREN)	Maricela Gutiérrez
Silicon Valley Chamber of Commerce	Derrick Seaver
Silicon Valley Community Foundation	Navin Moul
The Grove Foundation	Leslie Dorosin
Silicon Valley Council of Nonprofits	Wendy Ho
Working Partnerships USA	Bob Brownstein, Maria Fernandez
Office of Immigrant Affairs support	Nidia Gómez, Stephanie Jayne

WELCOMING SJ PLAN

Thank You

The Institute for Local Government provided strategy, design and facilitation assistance to the **City of San José's Office of Immigrant Affairs** to develop this plan. This technical assistance was a component of *A Regional Approach to Immigrant Integration in San Mateo and Santa Clara Counties*, a project to support the collaborative development of a regional immigrant integration strategy and increase the capacity of local officials and their communities to develop and sustain immigrant integration plans and practices.

The Institute for Local Government (ILG) is the non-profit education and research affiliate of the League of California Cities, the California State Association of Counties and the California Special Districts Association. ILG promotes good government at the local level with practical, impartial and easy-to-use resources for California communities. An important focus of the Institute's *Public Engagement Program* has been to provide resources to help local officials effectively engage immigrants in the civic and public sector life of their communities.

A special thanks to **The Grove Foundation, Heising-Simons Foundation** and **The Silicon Valley Community Foundation** for their financial support and strategic guidance that lead to an inclusive and robust community-driven plan.

The City of San José is deeply appreciative of the consideration and guidance provided by **Welcoming America** and **White House's Building Welcoming Communities Campaign**. They are leading the national charge to build a more inclusive, equitable and welcoming environment for immigrants.

Much gratitude to **Alejandra Barrio**, student at Goldman School of Public Policy, University of California at Berkeley, for her analysis of the planning process and contributions to this effort.



San José Office of Immigrant Affairs

Vision Statement

Immigrants and refugees are engaged, respected, and have opportunities to reach their fullest potential.

Mission Statement

To facilitate and accelerate immigrant integration through civic, economic, linguistic, and social inclusion.

Principles

Welcoming San José Steering Committee and the Office of Immigrant Affairs developed a set of five Guiding Principles that highlighted being as welcoming and inclusive as possible, engaging the receiving community as well as the immigrant community, and recognizing and valuing immigrant cultural contributions and leadership assets.

1. It is essential to engage the receiving community in ways that build greater understanding, particularly among people who may have concerns about — or are unaware of — the changing demographics of their community.
2. People of all backgrounds — socioeconomic, racial, ethnic, religious, etc. — have unique talents that can be brought to bear to make our communities vibrant, and welcoming should be as inclusive as possible to all groups.
3. Programs intended to help immigrants navigate the community and learn about local norms should also be respectful of and leverage the cultural and leadership assets and knowledge that immigrants bring.
4. Leaders can play a catalytic role by recognizing, rewarding, and investing in community partners who are essential to building a community's capacity for this work.
5. The voices of immigrants and the broader community are critical to the welcoming agenda.

WELCOMING SJ PLAN

Goals & Strategies

Leadership and Communications

Goal: Establish immigrant friendly policies, programs, and practices throughout the City that create an inclusive and welcoming environment for immigrants who live, work and visit the City.

RECOMMENDATIONS:

- 1. Create a City-wide culture such that all City staff recognize and celebrate the diversity of our community as well as promote and demonstrate welcoming and inclusive behaviors.**

Strategies:

- Year 1-3:** Develop or identify and implement a customer service excellence training for City staff with a significant cultural competency component that includes local immigrant leaders and utilizes the existing work of the County Office of Cultural Competency.
- Year 1:** Partner with local and national research organizations to build awareness of economic contributions of immigrants.
- Year 1-3:** Continue City leadership's active participation in immigrant community events, such as World Refugee Day, Immigrant Heritage Month, Citizenship Day, naturalization ceremonies, flag raising and cultural celebration events.



- Year 2:**

Establish the Office of Immigrant Affairs within City Manager's Office as the go-to office for City departments when needing feedback and input from immigrant communities.

- Year 2-3:**

Publicize the immigrant experience of City employees as a way to build a bridge with our immigrant residents during Immigrant Heritage Month.

- 2. Identify and advance immigrant-friendly policies and practices, both within the City and in our larger community.**

Strategies:

- Year 1:** Develop an interagency (City and County) communication mechanism to ensure consistent and timely messaging, information, and dissemination that affects the immigrant community.
- Year 1:** Coordinate with local organizations on state and federal legislative efforts that impact San José's immigrant communities.
- Year 1:** Support the police department in the implementation of its language access policy and Fair and Impartial Policing Training and share best practices and material with other City departments.



d. **Year 1-3:** Strategic collaborations with the County of Santa Clara, community-based organizations and key stakeholders to consider local policy and systems changes that level the playing field and eliminate social inequities.

e. **Year 1-3:** Support the City's process to increase access to City contracts by immigrant vendors, that includes culturally and linguistically appropriate outreach and detailed, yet practical, explanations of the process for immigrant vendors to be comfortable with and successful at City bid submissions.

f. **Year 2:** Create a protocol to flag City policies that impact the immigrant communities and a mechanism for the Office of Immigrant Affairs and partner organizations to provide input.

3. Enhance understanding and trust between longer-term residents and immigrant communities.



Strategies:

a. **Year 1:** Enhance Community Action and Pride (CAP) grants to promote “welcoming neighborhoods” through activities between long-term residents and new immigrants.

b. **Year 1-3:** Support cultural, service, and arts programs that build shared experiences and connections across San José's numerous ethnic communities and between longer-term residents and newcomers.

c. **Year 1-3:** In collaboration with community organizations, host dialogues and workshops that create a safe, respectful exchange of information and ideas between longer-term residents and immigrant communities, as well as City employees and residents.

Access and Engagement

GOAL: Improve immigrant access to City services and increase immigrant participation in civic life.

RECOMMENDATIONS:

4. Identify linguistic and cultural barriers to inclusion in City services for immigrant residents and develop/implement a plan to mitigate these barriers.

Strategies:

a. **Year 1:** Develop a plan to operationalize the Language Access Policy through a phased approach over three years.

b. **Year 1:** Assess current “language access” status in three departments, identify opportunities for enhancement with specific attention to efficiencies

and cultural and linguistic appropriateness, and future resources required to expand and improve in-language services.





- c. **Year 1:** Partner with community organizations to support outreach and education about City services and civic engagement opportunities for immigrants.
- d. **Year 2:** Create and institutionalize a mechanism for residents to voice their equal access concerns regarding public services, and for the City to address these concerns in a timely and appropriate response.
- e. **Year 3:** Collaborate with County of Santa Clara, community-based organizations, business sector and other local jurisdictions to create a coordinated immigrant navigation system for Silicon Valley, which educates the community on economic, legal, and social and health services available throughout Silicon Valley.

5. Increase immigrant engagement in civic engagement activities.

Strategies:

- a. **Year 1:** In partnership with community-based organizations, faith-based groups, and San José State University, develop a civic leadership project that educates immigrants on City services, local government policies, and processes in language.
- b. **Year 1:** Assess the composition of, and assess and update outreach and selection criteria for City of San José commissions, committees, and advisory boards to ensure representation of immigrant resident voices.

- c. **Year 1-2:** Conduct targeted outreach to immigrant groups for City Hall tours and information sessions, to be held in multiple languages.
- d. **Year 2:** Develop new volunteer and leadership opportunities within City and community programs and initiatives in partnership with community-based organizations, faith communities, and schools (i.e. example: library homework centers, reading buddies, citizenship coaches, City commission mentors, etc.).

6. Expand access to information and resources about the naturalization and voter registration processes.

Strategies:

- a. **Year 1:** Develop a City of San José naturalization public education and awareness campaign that leverages department interactions with the public in concert with local USCIS offices.
- b. **Year 1:** Support partner organizations' Voter Registration public education and awareness activities.
- c. **Year 1:** Create 5 new Citizenship Corners at City Community Centers
- d. **Year 1:** Partner with the National Immigration Forum's New American Workforce project to expand the network of San José businesses offering on-site citizenship workshops.
- e. **Year 1-3:** Coordinate citizenship activities with New Americans Campaign and partners.



Education

GOAL: Help immigrant students and families actively participate and succeed in the education system, by engaging as a change agent and collaborating partner.

RECOMMENDATIONS:

7. Remove barriers that keep students and immigrant families away from schools.

Strategies:

- a. **Year 2:** In partnership with school and community leaders, identify 3 key barriers that prevents the full participation and integration of immigrant children and their families into the education environment.
- b. **Year 2-3:** Develop and implement multi-sector strategies to mitigate these 3 barriers to immigrant integration in education.
- c. **Year 2-3:** Identify, support and promote proven family engagement strategies that focus on the unique needs of the immigrant community.
- d. **Year 3:** Strengthen and enhance partnerships between City libraries, community organizations and school sites to increase immigrant utilization of support services targeted at recently arrived immigrants (<5 years).
- e. **Year 1-3:** Expand the SmartWAVE Wifi Network to three attendance areas, with large immigrant populations, in East San José to facilitate advancing student academic achievement through internet-based learning technologies and instruction.

8. Expand opportunities for linguistic integration and education for children and adults.

Strategies:

- a. **Year 1:** Inventory English-Language Learning classes and promote programs through City networks including Parks and Recreation facilities and Libraries.
- b. **Year 1:** Promote existing multilingual literacy tools and early childhood education resources available through the Libraries and community organizations.

- c. **Year 2:** Work with local private companies to support and provide on-site ESL classes.

9. As appropriate, advocate for San José's education priorities at the County and State levels and address the professional development needs and economic realities of public school staff.

Strategies:

- a. **Year 1:** Engage local school districts and other agencies in seeking solutions to the housing challenges faced by public school teachers.
- b. **Year 2:** Collaborate with school and community leaders to identify priority needs and join collaborative advocacy efforts including incentivizing immigrant education training.
- c. **Year 3:** Leverage the City's cultural competency efforts to support professional development efforts at schools, focused on immigrant integration.



Economic Opportunity

GOAL: Expand economic opportunity for immigrants by helping immigrants improve job skills, growing immigrant small businesses, and generating employment opportunities.

RECOMMENDATIONS:

10. Promote skill development and career pathways to address the existing local skills gap.

Strategies:

- a. **Year 1:** Partner with the South Bay Adult Education Consortium of Adult schools, Community Colleges, and Alliance for Language Learners Integration, Education, and Success (ALLIES) to leverage skill development opportunities and include City-related services in the development of their immigrant integration pathway tool
- b. **Year 1:** Leverage initiatives such as TechHire and Strive San José, to improve access for immigrants to job training opportunities.
- c. **Year 1-3:** Support legislation that recognizes or recertifies foreign credentials.
- d. **Year 2:** Collaborate with local businesses and community colleges to identify and address middle skills training needs and opportunities for immigrant professionals.
- e. **Year 2:** Work with refugee and immigrant serving organizations and private sector to strengthen career pathways for skilled immigrants and refugees with foreign credentials.

11. Develop and implement a plan to support current and future immigrant owned business.

Strategies:

- a. **Year 1:** City to adopt practices that outreach, encourage and support small/minority owned businesses to bid on City projects
- b. **Year 1-3:** Provide information and appropriate outreach to immigrant communities about resources for starting businesses in San José.

c. **Year 1-3:**

Support and promote local small business events in the South Bay, including Small Business Saturday each November, Small Business Week, and the annual summit on innovation and entrepreneurship while also highlighting businesses owned by immigrants.



d. **Year 2-3:**

Convene neighborhood and business associations to identify strategies to support economic growth and progress for immigrant workers and their communities.

e. **Year 2-3:** Involve corporate ethnic affinity groups in “welcoming” activities.

f. **Year 3:** Convene neighborhood and business associations to identify strategies to support economic growth and progress for immigrant workers and their communities.



12. Explore and participate in partnership opportunities (inside and outside the City) to support the financial literacy needs of immigrant residents.

Strategies:

a. **Year 1-3:** Support the City's Financial Empowerment Initiative through the integration of services with the immigrant community so as to increase financial knowledge and access to tools and banking opportunities.

b. **Year 1-3:** Create and enhance partnerships with community-based organizations and non-profits, banks and other financial institutions, technology companies, government agencies, and others stakeholders to empower low-income immigrant residents to make informed financial decisions and have access to financial services and products that facilitate asset creation and economic self-sufficiency.

Safe, Healthy, and Connected Communities

GOAL: Foster trust and build relationships between immigrants and law enforcement, local government and the community at large, and create opportunities for quality connections and healthy living.



RECOMMENDATIONS:

13. Facilitate stronger relationships between public safety departments and San José's immigrant residents.

Strategies:

- a. **Year 1:** Foster positive interactions between the police and community, and educate new immigrant communities about their rights and responsibilities (Coffee with a Cop, workshops, neighborhood watch).
- b. **Year 1:** Develop an effective strategy to regularly communicate consistent dissemination of existing City law enforcement policies and practices regarding that safeguard existing due-process protections for undocumented immigrants.
- c. **Year 1:** Highlight the roles of the Community Liaison Officers dedicated to reaching the Vietnamese and Latino community.
- d. **Year 1:** Develop a U-Visa Policy that clearly delineates the process for timely certification of U-Visa requests by victims of crime.

e. **Year 1-3:** Coordinate efforts with the County District Attorney's Office, Sheriff's Office and engage the San José Police Department to prevent and prosecute immigration and notario fraud.

f. **Year 2:** Identify and implement a program to educate new immigrant communities about their rights and responsibilities within the context of public safety

14. Develop "access points" for immigrant residents to gain information and services that will contribute to greater community, family, and personal health.

Strategies:

a. **Year 1:** Determine the feasibility of establishing "welcoming hubs" at city hall, community centers and libraries, where staff is knowledgeable of critical onboarding components, such as enrolling in school, access to health care, mental health services, City and County services, and partner organization services.

b. **Year 2:** Engage immigrant communities who do not use City parks and community centers to better understand the barriers and make changes, when possible.

c. **Year 3:** Develop and implement the National Helpers Program – activating neighborhood volunteers via existing neighborhood associations, to connect neighbors and build relationships.

15. Support the immigrant community and the San José Housing Department in its efforts to address the affordable housing crisis.

Strategies:

a. **Year 1:** Include affordable housing/renter's rights as modules within the Civic Leadership Academy to help facilitate accurate information about affordable housing opportunities, provide concrete guidance on "how to" apply for such opportunities, and facilitate and educate to help victims of discrimination or maintain the housing of their choice.

b. **Year 2:** Assist the Housing Department with outreach to the immigrant community (in-language) to ensure a stronger immigrant voice on the City's housing and community development strategic planning process such as, the Envision San José 2040 General plan, Fair Housing Plans and the HUD 5-year Consolidated and Annual Action Plans.



RD:AFS:CER
8/4/2015

RES NO 77517

RESOLUTION NO. 77517

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN JOSE AFFIRMING THE CITY OF SAN JOSE AS A WELCOMING CITY

WHEREAS, fostering a welcoming environment for all individuals, regardless of race, ethnicity or place of origin, enhances the City of San José's ("City") cultural fabric, economic growth, global competitiveness and overall prosperity for current and future generations; and

WHEREAS, the City has long been recognized as a hospitable and welcoming place where people, families and institutions thrive and the contributions of all are celebrated and valued; and

WHEREAS, the City is committed to continue building a welcoming and neighborly atmosphere in our community, where all people, including immigrants, are welcome, accepted and integrated; and

WHEREAS, community efforts that promote understanding and collaboration between long-time residents and foreign-born community members are crucial to ensuring a welcoming environment; and

WHEREAS, the City encourages the business leadership, civic groups, other government agencies and community institutions and residents to join in a community-wide effort to expand prosperity and inclusion for all residents; and

WHEREAS, the City supports the national Cities for Citizenship initiative by encouraging legal permanent residents to pursue the naturalization process;

RD:AFS:CER
8/4/2015

RES NO 77517

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF SAN JOSE THAT:

The City is hereby affirmed as a Welcoming City, helping to unite our community and ensure that all are welcome here.

ADOPTED this 15th day of September, 2015, by the following vote:

AYES: CARRASCO, HERRERA, JONES, KALRA, KHAMIS,
M. NGUYEN, T. NGUYEN, PERALEZ, ROCHA;
LICCARDO.

NOES: OLIVERIO.

ABSENT: NONE.

DISQUALIFIED: NONE.



SAM LICCARDO
Mayor

ATTEST:



TONI J. TABER, CMC
City Clerk



NEW AMERICANS IN SAN JOSE AND SANTA CLARA COUNTY

A SNAPSHOT OF THE DEMOGRAPHIC AND ECONOMIC CONTRIBUTIONS OF IMMIGRANTS

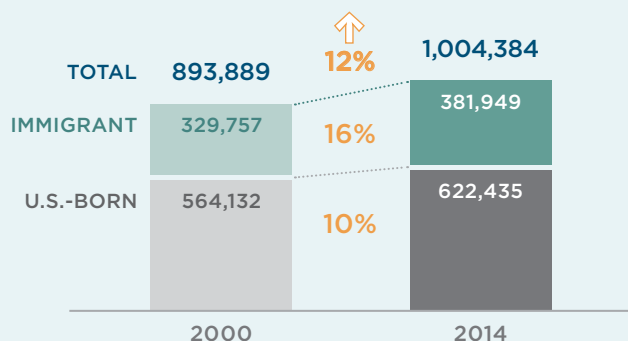
POPULATION GROWTH

In 2014, the population of **San José** reached more than **one million people** for the first time. The immigrant population also reached an all-time high — more than

38%
of the population
are immigrants.

In **Santa Clara County**, the overall population reached close to **two million people** in 2014, with immigrant residents making up

38%
of the population.

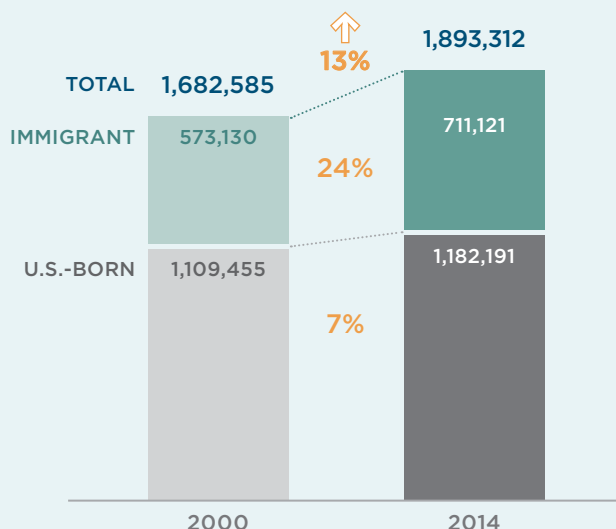


Overall, **San José's** population grew by 12.4% between 2000 and 2014, from almost 894,000 to 1 million. **Immigrants were responsible for 47.2% of this growth.** During this period, the immigrant population of San José grew by 15.8%, from just under 330,000 to almost 382,000. Meanwhile, the U.S.-born population of the city grew less, by 10.3% between 2000 and 2014.

POPULATION GROWTH, CONTINUED

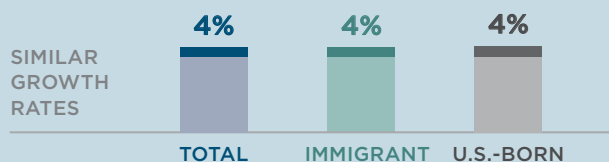
As a result of the increase in immigrants between 2000 and 2014, we estimate that 56,896 U.S.-born people were drawn to Santa Clara County.

Between 2000 and 2014, **Santa Clara County** grew by 12.5%, from 1.68 million to more than 1.89 million people, with the **immigrant population accounting for 65.5% of this growth**. During this period, the immigrant population of Santa Clara County grew by 24.1%, from 573,000 to more than 711,000. Meanwhile, the U.S.-born population grew by only 6.6%, from 1.11 million to 1.18 million between 2000 and 2014.

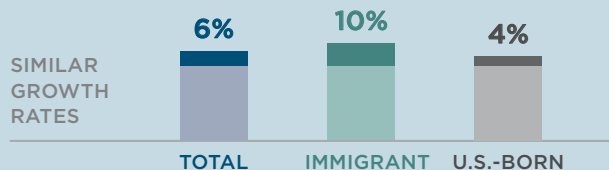


POPULATION GROWTH (2009-2014)

San José grew by 4% between 2009 and 2014, from 965,000 to 1 million, with immigrants responsible for **35.9% of this growth**. The immigrant population increased by 3.9%, from 367,000 to almost 382,000 in 2014. Meanwhile, the U.S.-born population of San José also increased at a similar rate, growing by 4.3%, from almost 597,000 to more than 622,000 in 2014.



Santa Clara County's overall population increased by 6.1%, from 1.78 million in 2009 to 1.89 million in 2014, with immigrants accounting for **62.8% of this growth**.¹ During this period, the immigrant population in Santa Clara County grew by more than 10%, from just under 643,000 in 2009 to more than 711,000 in 2014. This far outpaced growth in the U.S.-born population, which increased by 3.5% between 2009 and 2014.

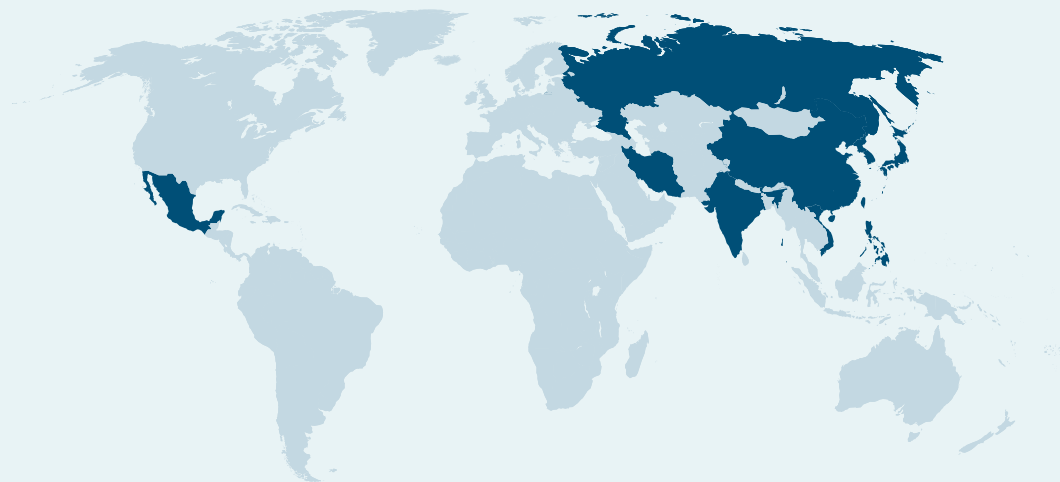


MIGRATION AND COUNTRIES OF ORIGIN

TOP 10 COUNTRIES OF ORIGIN OF IMMIGRANTS IN SANTA CLARA CO.

- Mexico** 139,831
(19.7% of all immigrants)
- India** 110,121 (15.5%)
- Vietnam** 99,691 (14%)
- China (incl. Hong Kong)**
77,358 (10.9%)
- Philippines** 59,758 (8.4%)
- Taiwan** 27,637 (3.9%)
- Korea** 17,406 (2.4%)
- Iran** 14,091 (2%)
- Japan** 11,256 (1.6%)
- Russia** 10,188 (1.4%)

Of the almost 19,000 immigrant residents of Santa Clara County that moved to the area in the past year, more than **51% came from India** (9,753 residents), **27.8% from China** (incl. Hong Kong and Macau), and **7.8% from Japan**. Canada (7.7%) and Mexico (5%) were also popular countries of origin for recent arrivals.



ECONOMIC CONTRIBUTIONS

In 2014, immigrants in Santa Clara County contributed an estimated

\$77 billion
to the county's economy

through their consumption and tax contributions.

The immigrant population in Santa Clara County wields considerable economic power. In 2014, immigrants held

\$27 billion
in spending power

46.4% of the county's total spending power.²

Given their income, we estimate that the immigrant population of Santa Clara County contributed almost

\$3 billion in state and local taxes

in 2014, including property, income, sales, and excise taxes levied by either the State of California or by municipal governments.³ Immigrant households also contributed

\$7 billion in federal taxes,

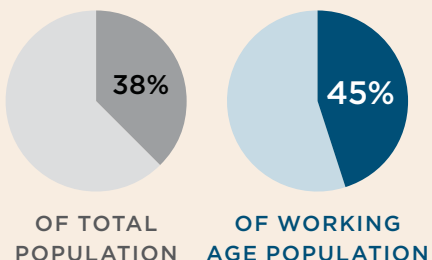
as well as

\$5 billion
to Social Security and

\$1 billion
to Medicare.

LABOR MARKET

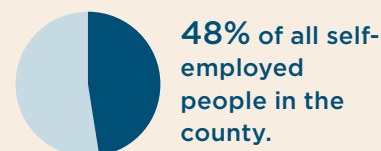
While immigrants make up 37.6% of Santa Clara County’s population, they make up an even larger share of the working age population. Immigrants make up 45% of all people ages 25 to 65.



Immigrants also make up a disproportionate share of the labor force in the county:

47%
of all employed people are immigrants.

Immigrants are overrepresented among the self-employed, making up



They are also slightly more likely than the U.S.-born to be entrepreneurs, with 8.9% of all immigrant workers running their own business, compared to 8.5% of all U.S.-born workers.

Immigrants play a critical role in some of California’s most important industries that continue to look for talented workers. In the top 5 industries in Santa Clara County by number of workers — Manufacturing, Professional and Technical Services, Healthcare and Social Assistance, Retail, and Arts and Hospitality — immigrants make up significant numbers, if not the majority share, of workers.

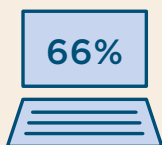


In 2014, **unemployment levels** for workers in these key industries were around or lower than California’s overall unemployment rate of 7.1%. They were:

Arts, Entertainment, & Recreation	7.4%
Retail Trade	6.8%
Accommodation & Food Services	6.8%
Manufacturing	5.5%
Construction	4.4%
Professional, Scientific, & Technical Services	4.1%
Healthcare and Social Assistance	2.9%

CONTINUED ON NEXT PAGE

LABOR MARKET, CONTINUED



In information and computer technology (ICT) related industries, immigrants make up a majority of all workers, two-thirds (66%) of workers are immigrants.

Unemployment for ICT workers was very low in 2014, with only 3% of ICT workers out of work.

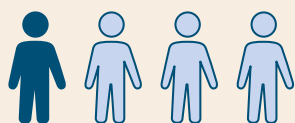
Similarly, immigrants are also more likely to work in several other industries, including...

Professional & Technical Services: 1.44x more likely

Construction: 1.2x more likely

Accommodation & Food Service: 1.2x more likely

Given their distribution in the economy, immigrants in Santa Clara County are **1.68 times more likely to work in manufacturing** than the U.S.-born.



In other words, while nearly **1 in 4 immigrant** workers work in manufacturing...



...less than **1 in 7 U.S.-born** workers do.

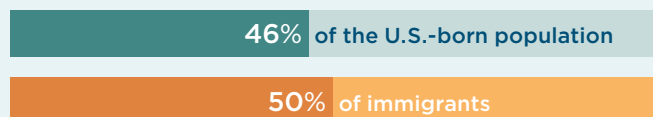
Looking specifically at advanced manufacturing industries, we find that immigrants also play a large role in supporting this sector of the economy. Overall, **immigrants made up 60.2% of the advanced manufacturing workforce**. In the 5 largest segments by number of workers, immigrant workers made up:

Computer & Electronics Manufacturing	65.2%
Chemical Product Manufacturing	54.4%
Fabricated Metal Products	51.7%
Medical Equipment	50.6%
Motor Vehicle, Aircraft, and Ship Buildings	36.8%

EDUCATION LEVEL

While Santa Clara is already one of the most well-educated counties in the United States, the county's immigrant population has particularly high rates of educational attainment.

The share of the immigrant population aged 25 and up with **at least a bachelor's degree** is 49.8%. Meanwhile, 46.1% of the U.S.-born population over the age of 25 has at least a bachelor's degree.

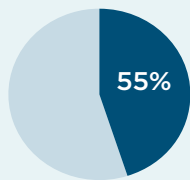


More than 1 in 4 immigrant residents over the age of 25 has an **advanced degree** (26%). This is higher than the share of U.S.-born residents, 18.4%, or less than 1 in 5, who have an advanced degree.



ENTREPRENEURSHIP

As of 2014, there were **more than 23,500 immigrant business owners** in San José, representing 54.6% of all entrepreneurs.



OF SAN JOSE ENTREPRENEURS ARE IMMIGRANTS

Overall, immigrants in San José are slightly more likely to be self-employed than the U.S.-born, with

1 in 10 immigrants (10%)

working for their own business, while

less than 1 in 10 (9%) U.S.-born workers

is self-employed.

Self-employed immigrants in San José have a

combined annual business income over

\$743 million,

a figure that totals more than half of all business income for self-owned businesses in the city.

Santa Clara County is home to 14 Fortune 500 companies as of 2015. Of these firms, 50% were founded either by immigrants or by the children of immigrants.

These companies combined had annual revenues of

\$393 billion

in FY2014.

According to the 2012 Survey of Business Owners, there were 3,033 Hispanic-owned businesses in Santa Clara County.

These businesses employed

24,464 people

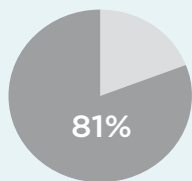
in the county and had combined total revenues of almost **\$4.2 billion.**

Across the county, immigrant entrepreneurs are **particularly represented** in several industries:

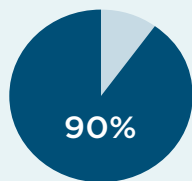
Retail Trade	72.2%
Manufacturing	63.4%
Accommodation & Food Services	60%
Construction	59%
Healthcare & Social Assistance	42.8%

LANGUAGE

As of 2014, 81% of immigrant children--those under the age of 18--in Santa Clara County lived in households that spoke a language other than English at home. Meanwhile, for immigrant adults over the age of 18, 90.2% lived in households that spoke a language other than English at home.

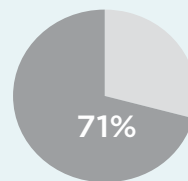


OF IMMIGRANT CHILDREN SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME

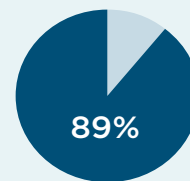


OF IMMIGRANT ADULTS SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME

When looking just at naturalized citizens, we find that 89.2% of adults and 71% of children under the age of 18 speak a language other than English at home.



OF CHILDREN SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME



OF ADULTS SPEAK A LANGUAGE OTHER THAN ENGLISH AT HOME

LONG-TERM BENEFITS OF INTERNATIONAL STUDENTS REMAINING IN THE COUNTY AFTER GRADUATION

In Fall 2014, there were
12,375 students
 at Santa Clara County area universities who were **international students**.

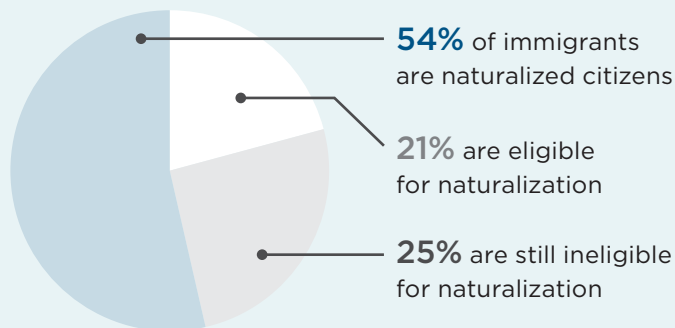
These international students supported an **estimated 4,702 jobs** in Santa Clara County and **contributed over \$425 million** to the local economy by virtue of their spending and tuition payments.⁴

If Santa Clara County retains **one-half**, or 6,188, of its international students after graduation with bachelor's degrees or higher, **3,183 local jobs** will be created within six years.⁵

Such retention will also boost the metro area's **GDP per capita by \$552** within the next 30 years,⁶ and increase the population by **23,863 people** within the next 50 years.⁷

NATURALIZATION/CITIZENSHIP

As of 2014, of the over 711,000 immigrant residents of Santa Clara County, 53.8% were naturalized citizens. Meanwhile, a further 147,000 immigrant residents, or 20.8% of the entire immigrant population, are estimated to be eligible for naturalization. More than 180,000, or about 25.4% of the immigrant population in 2014 was still ineligible for naturalization.



⁴ Estimates come from NAFSA's factsheet series, "Benefits from International Students." <https://istart.iu.edu/nafsa/reports/state.cfm?state=CA&year=2014>

⁵ Curtis Simon, "Human Capital and Metropolitan Employment Growth," Journal of Urban Economics 43, (1998).

⁶ Rita Ray, "Effect of Education on Gross Domestic Product: A Case Study from US 'Mid-West'," International Review of Business Research Papers, Vol. 10-1. (March, 2014).

⁷ Edward L. Glaeser, Giacomo A. M. Ponzetto, and Kristina Tobio, "Cities, Skills and Regional Change," Regional Studies, Vol. 48-1, (January, 2014).



EXHIBIT 55

1 JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
2 COVINGTON & BURLING LLP
One Front Street, 35th Floor
3 San Francisco, CA 94111-5356
Telephone: (415) 591-6000
4 Facsimile: (415) 591-6091
Email: jdavids@cov.com,
5 abersin@cov.com
*Attorneys for Plaintiffs The Regents of the
6 University of California and Janet Napolitano, in
her official capacity as President of the
7 University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
9 JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
Los Angeles, CA 90071-3197
11 Telephone: (213) 229-7000
Facsimile: (213) 229-7520
12 Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
13 jgabriel@gibsondunn.com
*Attorneys for Plaintiffs Dulce Garcia, Miriam
14 Gonzalez Avila, Saul Jimenez Suarez, Viridiana
Chabolla Mendoza, Norma Ramirez, and Jirayut
15 Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
*Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
26 official capacity as Acting Secretary of the
Department of Homeland Security,

27 Defendants.
28

CASE NO. 17-CV-05211-WHA

**DECLARATION OF DR. JAMES L.
MADARA, MD**

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

1 COUNTY OF SANTA CLARA and
2 SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

3 Plaintiffs,

4 v.

5 DONALD J. TRUMP, in his official capacity
6 as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
7 capacity as Attorney General of the United
States; ELAINE DUKE, in her official
8 capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
9 DEPARTMENT OF HOMELAND
SECURITY,

10 Defendants.

CASE NO. 17-CV-05813-WHA

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1 I, JAMES L. MADARA, MD, HEREBY SUBMIT THE FOLLOWING DECLARATION IN
2 SUPPORT OF THE PLAINTIFFS IN THE ABOVE-CAPTIONED MATTERS:

3 1. I am a Medical Doctor as well as the Chief Executive Officer and Executive Vice
4 President of the American Medical Association (the "AMA"), an Illinois not-for-profit corporation. I
5 am also an adjunct professor of pathology at Northwestern University in Chicago, Illinois.
6

7 2. The AMA is the largest professional association of physicians, residents and medical
8 students in the United States. Additionally, through state and specialty medical societies and other
9 physician groups, seated in the AMA's House of Delegates, substantially all United States physicians,
10 residents and medical students are represented in the AMA's policy making process. The objectives of
11 the AMA are to promote the science and art of medicine and the betterment of public health. Its
12 members practice in every state and in every medical specialty.
13

14 3. It is the position of the AMA that our nation's health care workforce depends on the care
15 provided by physicians and medical students with Deferred Action for Childhood Arrivals ("DACA")
16 program status. These physicians and students are trained at medical schools in the United States and
17 fill gaps in patient care, as well as offset the current deficit in the physician workforce. The Health
18 Resources and Services Administration reported that there is a current shortage of over 8,200 primary
19 care physicians. Likewise, an independent study by the Association of American Medical Colleges has
20 projected that the total physician deficit will grow to between 61,700 and 94,700 physicians by 2025.
21 American born physicians will, by themselves, be unlikely to fill these shortages. Estimates have shown
22 that the DACA initiative could help introduce 5,400 previously ineligible physicians into the U.S. health
23 care system in the coming decades to help address these shortages and ensure patient access to care.
24

25 4. Removing medical professionals with DACA status will create care shortages,
26 particularly for rural and other underserved areas. DACA physicians are more likely to work in high-
27 need areas where communities face challenges in recruiting other physicians. DACA students are also
28

1 more likely to be bilingual, to come from diverse cultural backgrounds, and to understand challenges in
2 certain ethnic communities. The AMA is concerned that without these DACA physicians, the quality of
3 care provided in these communities will decline and patient access to care will suffer.

4 5. Those protected by the DACA program also include medical students, residents, and
5 fellows who are working to complete the lengthy and rigorous training and education needed to become
6 a physician. In 2016, 108 students with DACA status applied to U.S. allopathic medical schools. Those
7 who enrolled will now face uncertainty about completing their degrees, paying their student loans, and
8 serving patients. Furthermore, if DACA residents are unable to complete their training, which typically
9 spans three to six years after medical school, this could potentially waste graduate medical education
10 funds, leave training slots unfilled, and generally exacerbate the physician shortage our country is
11 facing, especially for our most vulnerable patients. The AMA believes that for the good of the DACA
12 recipients and our nation's healthcare system as a whole, these DACA recipients should be able to
13 continue to study, work, and improve patient access to care without the fear and uncertainty of being
14 removed before their training is completed.

15 16
17 6. Those with DACA status help contribute to a diverse and culturally responsive physician
18 workforce, which benefits all patients. These individuals have demonstrated their commitment to the
19 United States in numerous ways by attending medical school, training to become doctors, caring for
20 patients, conducting research, and improving our health care system.

21 22 7. Additionally, on behalf of the AMA, I previously submitted a letter to Senate Majority
23 Leader Mitch McConnell, Senate Democratic Leader Chuck Schumer, Speaker of the House Paul Ryan,
24 and House Democratic Leader Nancy Pelosi on September 5, 2017, describing AMA's position
25 regarding the cancellation of DACA as I have explained it here, and urging Congress to support DACA
26 recipients and pass a legislative solution in the near future. A true and correct copy of that letter is
27 attached to this declaration as Exhibit A.
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I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct.

Executed on 10/25, 2017, in Chicago, Illinois.



James L. Madara, M.D.

EXHIBIT A



JAMES L. MADARA, MD
EXECUTIVE VICE PRESIDENT, CEO

ama-assn.org
t (312) 464-5000

September 5, 2017

The Honorable Mitch McConnell
Senate Majority Leader
United States Senate
S-230 U.S. Capitol
Washington, DC 20510

The Honorable Chuck Schumer
Democratic Leader
United States Senate
S-221 U.S. Capitol
Washington, DC 20510

The Honorable Paul Ryan
Speaker of the House of Representatives
U.S. House of Representatives
H-232 U.S. Capitol
Washington, DC 20515

The Honorable Nancy Pelosi
Democratic Leader
U.S. House of Representatives
H-204 U.S. Capitol
Washington, DC 20515

Dear Majority Leader McConnell, Democratic Leader Schumer, Speaker Ryan, and Democratic Leader Pelosi:

On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to urge Congress to take prompt action to protect and provide stability for individuals with Deferred Action for Childhood Arrivals (DACA) status. President Trump's recent announcement to end the DACA program in six months fails to recognize the enormous contributions of hundreds of thousands of individuals who are living, working, and providing vital services in the United States, including health care services. We particularly are concerned that this reversal in policy could have severe consequences for many in the health care workforce, impacting patients and our nation's health care system. Accordingly, we urge Congress to act quickly to ensure that individuals with DACA status are able to remain in the United States.

Our nation's health care workforce depends on the care provided by physicians and medical students with DACA status, who are trained at medical schools in the United States and fill gaps in patient care, as well as offset the deficit in the physician workforce. The Health Resources and Services Administration reported that there is a current shortage of over 8,200 primary care physicians. Likewise, an independent study by the Association of American Medical Colleges has projected that the total physician deficit will grow to between 61,700 and 94,700 physicians by 2025. Estimates have shown that the DACA initiative could help introduce 5,400 previously ineligible physicians into the U.S. health care system in the coming decades to help address these shortages and ensure patient access to care.

Removing those with DACA status will particularly create care shortages for rural and other underserved areas. DACA physicians are more likely to work in high-need areas where communities face challenges in recruiting other physicians. DACA students are also more likely to be bilingual, to come from diverse cultural backgrounds, and to understand challenges in certain ethnic communities. Without these

The Honorable Mitch McConnell
The Honorable Chuck Schumer
The Honorable Paul Ryan
The Honorable Nancy Pelosi
September 5, 2017
Page 2

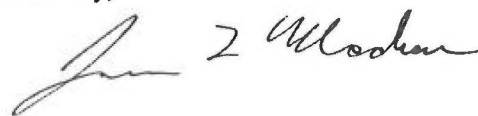
physicians, the AMA is concerned that the quality of care provided in these communities will be negatively impacted and that patient access to care will suffer.

Those protected by the DACA program also include medical students, residents, and fellows who are working to pass the lengthy and rigorous training and education needed to become a physician. In 2016, 108 students with DACA status applied to U.S. allopathic medical schools. Those who enrolled will now face uncertainty about completing their degrees, paying their student loans, and serving patients. Furthermore, if DACA residents are unable to complete their training, which typically spans three to six years after medical school, this could potentially waste graduate medical education funds, leave training slots unfilled, and generally exacerbate the physician shortage our country is facing, especially for our most vulnerable patients. The AMA believes that these DACA recipients should be able to continue to study, work, and improve patient access to care without the fear and uncertainty of being deported before their training is completed.

The Administration has acknowledged that Congress could act to continue the DACA program and has provided a six-month timeframe for lawmakers to consider alternatives. The AMA urges Congress to pass legislation, such as the Dream Act of 2017 (S. 1615/H.R. 3440), that would provide a solution to ensure DACA recipients are protected and do not face continuous threats and potential legal challenges.

Those with DACA status help contribute to a diverse and culturally responsive physician workforce, which benefits all patients. These individuals have demonstrated their commitment to the United States in numerous ways by attending medical school, training to become doctors, caring for patients, conducting research, and improving our health care system. We therefore urge Congress to support these DACA recipients and pass a legislative solution in the near future.

Sincerely,

A handwritten signature in cursive script, appearing to read "James L. Madara".

James L. Madara, MD

EXHIBIT 56

1 JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
2 COVINGTON & BURLING LLP
One Front Street, 35th Floor
3 San Francisco, CA 94111-5356
Telephone: (415) 591-6000
4 Facsimile: (415) 591-6091
Email: j davidson@cov.com,
5 abersin@cov.com
Attorneys for Plaintiffs The Regents of the
6 *University of California and Janet Napolitano, in*
her official capacity as President of the
7 *University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
9 JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
Los Angeles, CA 90071-3197
11 Telephone: (213) 229-7000
Facsimile: (213) 229-7520
12 Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
13 jgabriel@gibsondunn.com
Attorneys for Plaintiffs Dulce Garcia, Miriam
14 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
Chabolla Mendoza, Norma Ramirez, and Jirayut
15 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

18
19 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
26 official capacity as Acting Secretary of the
Department of Homeland Security,

27 Defendants.
28

CASE NO. 17-CV-05211-WHA

DECLARATION OF MIGUEL MÁRQUEZ

1 STATE OF CALIFORNIA, STATE OF
 2 MAINE, STATE OF MARYLAND, and
 STATE OF MINNESOTA,
 3
 Plaintiffs,
 4
 v.
 5 U.S. DEPARTMENT OF HOMELAND
 SECURITY, ELAINE DUKE, in her official
 6 capacity as Acting Secretary of the Department
 of Homeland Security, and the UNITED
 7 STATES OF AMERICA,
 8
 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,
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 Plaintiffs,
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 v.
 12 DONALD J. TRUMP, President of the United
 States, in his official capacity, ELAINE C.
 13 DUKE, in her official capacity, and the
 UNITED STATES OF AMERICA,
 14
 Defendants.

CASE NO. 17-CV-05329-WHA

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 16 DULCE GARCIA, MIRIAM GONZALEZ
 AVILA, SAUL JIMENEZ SUAREZ,
 17 VIRIDIANA CHABOLLA MENDOZA,
 NORMA RAMIREZ, and JIRAYUT
 LATTHIVONGSKORN,
 18
 Plaintiffs,
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 v.
 20
 21 UNITED STATES OF AMERICA, DONALD
 J. TRUMP, in his official capacity as President
 of the United States, U.S. DEPARTMENT OF
 22 HOMELAND SECURITY, and ELAINE
 DUKE, in her official capacity as Acting
 23 Secretary of Homeland Security,
 24
 Defendants.

CASE NO. 17-CV-05380-WHA

1 COUNTY OF SANTA CLARA and
2 SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

CASE NO. 17-CV-05813-WHA

3 Plaintiffs,

4 v.

5 DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
6 BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
7 States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
8 of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
9 SECURITY,

10 Defendants.

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1 I, MIGUEL MÁRQUEZ, DECLARE:

2 1. I am the Chief Operating Officer for the County of Santa Clara (the “County”). I have
3 personal knowledge of the facts stated herein and, if called as a witness, I could testify to them
4 competently under oath.

5 2. I have been the Chief Operating Officer for the County since August 2016. In this
6 capacity, I supervise and oversee the County’s operations. From 2012-2016, I served as an Associate
7 Justice on California’s Sixth District Court of Appeal. Before my appointment to the Court of Appeal,
8 from 2009-2012, I served as County Counsel and the Acting County Counsel of the County. In this
9 capacity, I advised the County Board of Supervisors and executives on a broad range of legal matters,
10 including issues involving finance, local governance, and local policy. Before my employment at the
11 County, I represented several other public entities in connection with matters involving governance and
12 finance, among other things.

13 3. I have been in high-level roles at the County and other public entities for nearly twenty
14 years. I am extremely familiar with the County’s policies, structure, operations, and budgeting
15 processes.

16 4. The County was established in 1850 as one of the first counties in California. Today,
17 approximately 1.9 million people reside in Santa Clara County. Thirty-eight percent of the county’s
18 residents are foreign born. County residents rely on the County to provide essential services, such as
19 law enforcement, health care, care for the county’s youth and elderly, and other social services. Many
20 of the County’s programs serve its neediest residents, including abused and neglected children, indigent
21 and uninsured individuals requiring health care, individuals who are mentally ill or substance dependent,
22 and those who are physically or mentally disabled.

23 5. The County is one of the largest employers in the region, with more than 18,000
24 employees addressing the diverse needs of its residents. The County oversees most public health and
25 public safety functions in Santa Clara County, including emergency planning and services, disease
26 control and prevention, and criminal justice administration. The County also operates roads, airports,
27 parks, libraries, election systems, and many other critical functions.

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1 6. One of the primary ways in which the County has benefited from the Deferred Action for
2 Childhood Arrivals (DACA) program is through its employment relationships with DACA recipients.
3 DACA recipients have relevant skills that make them particularly valuable in the County's efforts to
4 meet the unique needs of its residents. For example, many DACA recipients' lived experience,
5 particularly with immigration, is akin to that of the County residents we must effectively serve. Further,
6 the vast majority of DACA recipients are bilingual. The County values this skill because it helps ensure
7 meaningful access to services for all Santa Clara County residents, including the more than half of
8 county residents who speak a language other than English at home. The County invests in the provision
9 of language access services to its residents by contracting with outside vendors and hiring in-house
10 interpreters. The County, for instance, employs in-house interpreters to provide interpretation services
11 at the Santa Clara Valley Medical Center. But the County faces challenges in filling its open positions –
12 it currently has a number of openings for interpreter positions. Rescinding DACA and thereby removing
13 a class of bilingual applicants from potential consideration for these positions will further shrink the
14 already limited applicant pool.

15 7. The County has made significant investments in its DACA-recipient employees. It has
16 taken the time and effort to hire and train DACA recipients in their new roles. If DACA recipients who
17 are County employees were to lose their work authorization, the County would be forced to terminate
18 their County employment. As a result, the County would not only lose out on its investment in DACA
19 recipients, it would be forced to expend significant resources to address the turnover. The County would
20 be forced to temporarily fill positions, conduct hiring searches, and train new employees.

21 8. In addition to its DACA-recipient employees, the County employs at least three DACA
22 recipients as fellows in its New Americans Fellowship Program. The County began the program in July
23 2017. Since then, 20 fellows have participated in the program, with 10 fellows receiving placements in
24 County departments or Board of Supervisors Offices and 10 participating in the Silicon Valley Dream
25 Summer, a fellowship program placing immigrant youth in community-based organizations. Fellows
26 commit to working a minimum of 20 hours per week, for a period no less than 10 weeks. This program
27 aims to identify, recruit, and develop DACA recipients to serve as ambassadors to Santa Clara County
28 residents. Fellows in the program work on a wide range of impactful projects, including developing a

1 plan for a “Community Safety Initiative” focused on problem-solving relationships between immigrant
 2 and refugee residents and local law enforcement, creating a framework for a “Civics Empowerment
 3 Education Program” to develop a curriculum for immigrants and refugees to learn more about law and
 4 policy, and launching a countywide campaign to promote financial literacy.

5 9. The County has allocated \$400,000 to support the New Americans Fellowship Program,
 6 including \$200,000 for additional fellows, but the program’s future is uncertain in light of the rescission
 7 of DACA. Like other forms of County employment, the program could not continue if DACA is
 8 rescinded and DACA recipients lose their work authorization.

9 10. The New Americans Fellowship Program is just one of a number of ways in which the
 10 County has invested in DACA recipients. The County previously allocated \$200,000 for outreach and
 11 education regarding the DACA program and to support DACA eligible residents in completing their
 12 applications. After the Trump Administration’s rescission announcement, the County allocated an
 13 additional \$200,000 from its contingency reserve to assist DACA recipients with completing renewal
 14 applications before the October 5, 2017 renewal deadline.

15 11. In recognition of the many ways in which DACA recipients have contributed to the
 16 County, the County’s Board of Supervisors unanimously adopted a resolution affirming its support for
 17 the DACA program and its commitment to immigrant youth and young adults.

18 12. As a safety-net service provider, the County also stands to incur additional costs as a
 19 result of the rescission of DACA. The County operates the Santa Clara Valley Medical Center
 20 (“SCVMC”), a public safety-net hospital that provides, and in some cases is required to provide,
 21 services to poor and uninsured residents. Since payments from these patients and public insurance
 22 programs do not cover the costs of services patients receive at SCVMC, the County provides a
 23 substantial subsidy to SCVMC each year to cover the deficits incurred. During the first three quarters of
 24 fiscal year 2017, SCVMC provided more than \$90 million in unreimbursed services. DACA recipients
 25 who will stand to lose their employment – and therefore their employer-sponsored health insurance –
 26 will face uncertainty as to their health insurance coverage for routine and preventive care. The rescission
 27 of DACA will also cause renewed uncertainty among DACA recipients and their families about their
 28 legal status. As a result of this uncertainty and fear of deportation, some SCVMC patients may choose

1 not to seek or receive routine or preventive health care and only seek health care when they experience
2 emergencies. These patients would increase SCVMC's costs, and as a result, the County's expense in
3 subsidizing SCVMC's costs, as emergency care is much costlier to provide than routine or preventive
4 care.

5 13. Likewise, the County Office of Supportive Housing (OSH) seeks to increase the supply
6 of housing and supportive housing that is affordable and available to low-income or special needs
7 households. In fiscal year 2015, the County allocated \$73.8 million in resources to housing and related
8 services countywide, and in 2015, the Board of Supervisors approved increasing these expenditures by
9 \$33.9 million over FY 2016-2018. One such service is the provision of housing subsidies to families in
10 need of support to pay their rent. In the course of working with families to which it provides subsidies,
11 OSH has experienced the impact that the uncertainty of legal status can have on families seeking shelter.

12 14. Similarly, the County's Code Enforcement Division, which enforces zoning and building
13 ordinances to ensure safe living conditions for county residents, has received reports that some tenants
14 are reluctant to report code violations because landlords have threatened to report immigrants to
15 Immigration and Customs Enforcement.

16 15. Along with inhibiting the receipt and efficient provision of these services, DACA's
17 rescission would hinder the County's ability to protect the safety of its residents. DACA recipients were
18 granted a status that enabled them to feel secure in their lawful presence in America. That security
19 enabled DACA recipients to engage more freely with the government without fear of detention or
20 deportation. DACA recipients – and, in some instances, their friends and families – will experience a
21 renewed reluctance to engage with the government for fear of immigration consequences. Indeed,
22 DACA-recipient County employees felt compelled by fear of immigration enforcement actions against
23 them or their families to forgo the opportunity to assert their rights in this litigation.

24 16. Both of the law enforcement agencies in the county, the Santa Clara County District
25 Attorney's Office and the Sheriff's Office, rely on community cooperation in conducting investigations
26 into crimes committed in the county. With the heightened reluctance of immigrant communities to
27 engage with the government that is likely to result from the rescission of DACA, it will be more difficult
28 for these law enforcement agencies to gather information from these communities.

1 17. As another example, the County’s Public Health Department, which provides disease
2 control and pandemic response services throughout the County—and functions as the public health
3 agency for each of the cities within Santa Clara County—would likely have more difficulty engaging
4 DACA recipients and their families to provide them with services, such as immunizations and
5 preventive therapy, that help safeguard the public health of all county residents.

6 18. The harmful impacts of DACA’s rescission could extend to DACA recipients’ families.
7 Mixed status families may see young documented children separated from their DACA recipient parent.
8 The threat of the Trump Administration’s action coming between DACA recipients and their children is
9 particularly prominent in Santa Clara County, where approximately sixty percent of children have at
10 least one parent who is foreign born. In these cases, the documented children may enter the foster care
11 system. The County provides financial support to foster parents to satisfy the basic needs of foster youth
12 placed in their care. In fiscal year 2017, the County invested \$25 million in foster care youth, and the
13 separation of DACA recipients’ families because of the rescission of DACA could bring more children
14 into the foster care system, increasing the cost to the County.

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19. In sum, the rescission of DACA will deprive the County of a talented labor pool, and it will have a negative public safety and fiscal impact on the County.

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

Executed on October 26, 2017, in San José, California.



MIGUEL MÁRQUEZ

EXHIBIT 57

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
9 ETHAN D. DETTMER (SBN 196046)
10 JESSE S. GABRIEL (SBN 263137)
11 GIBSON, DUNN & CRUTCHER LLP
12 333 South Grand Avenue
13 Los Angeles, CA 90071-3197
14 Telephone: (213) 229-7000
15 Facsimile: (213) 229-7520
16 Email: tboutrous@gibsondunn.com,
17 edettmer@gibsondunn.com,
18 jgabriel@gibsondunn.com
19 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
20 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
21 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
22 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
22 CALIFORNIA and JANET NAPOLITANO,
23 in her official capacity as President of the
24 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
26 SECURITY and ELAINE DUKE, in her
27 official capacity as Acting Secretary of the
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF KEVIN M. MAXWELL

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

<p>1 COUNTY OF SANTA CLARA and</p> <p>2 SERVICE EMPLOYEES INTERNATIONAL</p> <p>3 UNION LOCAL 521,</p> <p>4</p> <p>5 Plaintiffs,</p> <p>6</p> <p>7 v.</p> <p>8 DONALD J. TRUMP, in his official capacity</p> <p>9 as President of the United States, JEFFERSON</p> <p>10 BEAUREGARD SESSIONS, in his official</p> <p>11 capacity as Attorney General of the United</p> <p>12 States; ELAINE DUKE, in her official</p> <p>13 capacity as Acting Secretary of the Department</p> <p>14 of Homeland Security; and U.S.</p> <p>15 DEPARTMENT OF HOMELAND</p> <p>16 SECURITY,</p> <p>17</p> <p>18 Defendants.</p>	<p>CASE NO. 17-CV-05813-WHA</p>
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11 I, Kevin M. Maxwell, Ph.D., declare and state as follows:

12 1. I am the Chief Executive Officer of Prince George’s County Public Schools (PGCPS)

13 located within the State of Maryland.

14 2. I have served as the Chief Executive Officer of PGCPS since 2013.

15 3. PGCPS is invested in providing academic excellence within a safe and welcoming

16 school environment for all its 131,000 students, 19,000 employees, and families.

17 4. As the second largest school system in Maryland and the 25th largest in the country,

18 we take seriously our role as educational leaders. Our district represents a myriad of

19 races/ethnicities, with over 93% of our students identifying as African American/Black and

20 Latino/Hispanic, 64% receiving Free and Reduced Priced Meals, 22,000 English Learners, and

21 47,000 international students. Our students speak over 164 languages from over 129 countries.

22 PGCPS is providing a world class education for the next wave of American leaders.

23 5. As we abide by federal regulations, PGCPS does not track students’ immigration

24 status. However, through requests for support received by staff, decreased attendance and

25 decreased parental engagement when Immigration and Custom Enforcement (ICE) was feared, we

26 are aware that our district has a significant number of undocumented youth and families, some of

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1 which receive benefits currently in place under the Deferred Action for Childhood Arrivals
2 (DACA) Program.

3 6. It stands to reason that our county then has a large number of DACA and DACA
4 eligible recipients.

5 7. As a district we have emphasized an investment in our English Learners and new
6 Americans, in the following ways: opening two international high schools to meet the needs of our
7 new Americans; creation of the Office of Diversity Affairs, to provide systemic input to removing
8 barriers for students to access educational opportunities; and increased funding for the Office of
9 Interpreting and Translation to provide language access to families of English Learners.

10 8. We see these investments in our students and families as an integral piece in fulfilling
11 our mission to educating thriving citizens. Education is the cornerstone of any federal or state plan
12 to increase economic opportunities. Research overwhelming demonstrates that students with a high
13 school diploma, associate's degree, and bachelor's degree earn more than students who drop out of
14 school. When students stay in school and pursue post-secondary opportunities, juvenile
15 delinquency and crime is reduced.

16 9. The potential impact of the termination of DACA on our students, families, staff, and
17 community could be unprecedented. With over 47,000 international students in PGCPSS we
18 anticipate the following negative impacts: decreased attendance as students will no longer see post-
19 secondary education as a possibility and will drop out sooner to pursue work in a shadow
20 economy; diminished resources to serve the needs of this vulnerable population, as district funding
21 is determined in large part by the total number of students enrolled; and increased need for social-
22 emotional supports, such as trauma informed counselors, as students see families in their
23 communities torn apart as a result of deportation.

24 10. In anticipation of the enactment of the termination of DACA, PGCPSS has
25 convened a Rapid Response Team comprised of the Diversity Officer, General Counsel, and senior
26 staff from the offices of Pupil Accounting, Student Services, and Security Services. We are
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developing training and protocols to provide support to school-based administrators and staff in the event that they have parents who are detained by Immigration and Customs Enforcement (ICE) and have left no provisions for the care of their children.

11. In addition, Prince George’s County Public Schools continues to stand committed to safeguarding the personal information of our families to the fullest extent of the law. We cannot provide instruction under a cloak of fear and our schools cannot become the campus on which ICE decides to conduct their operations. We must abide by our federal civil rights laws and ensure the rights of *all* students to a free public school education.

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

Executed on 10/26/17 in Upper Marlboro, Maryland.



KEVIN M. MAXWELL, PH.D

EXHIBIT 58

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: jdavidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

14 THEODORE J. BOUTROUS, JR. (SBN 132099)
15 ETHAN D. DETTMER (SBN 196046)
16 JESSE S. GABRIEL (SBN 263137)
17 GIBSON, DUNN & CRUTCHER LLP
18 333 South Grand Avenue
19 Los Angeles, CA 90071-3197
20 Telephone: (213) 229-7000
21 Facsimile: (213) 229-7520
22 Email: tboutrous@gibsondunn.com,
23 edettmer@gibsondunn.com,
24 jgabriel@gibsondunn.com
25 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
26 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
27 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
28 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF ANNE MCLEOD

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, Anne McLeod, declare:

2 1. I am the Senior Vice President, Health Policy and Innovation, with the California Hospital
3 Association (CHA). I have served at CHA in this, and similar positions, for more than 10 years. CHA
4 represents hospitals and health systems in California on state and federal legislative and regulatory
5 issues. In my role, I provide leadership for developing policy objectives that support the implementation
6 of health care reforms and the transformation of health care in the future. I have worked on health
7 policy issues that include access to care, health care coverage and health care financing and delivery
8 system improvement. In my work I have promoted initiatives aimed at enhancing the health care
9 infrastructure, including developing strategic solutions to meet the demand for health care professionals
10 and supporting education and training programs that promote expanding access to care in all
11 communities in California including underserved areas.

12 2. Access to medical insurance is an important component of public health. By providing work
13 authorization, DACA has significantly improved access to employer-based health insurance. More than
14 90 percent of DACA grantees are employed, and 57 percent of DACA grantees credit the program with
15 securing a job with health insurance or other benefits, according to a 2017 survey.¹ These individuals
16 are not eligible to purchase health insurance in a Marketplace, even at full cost, and they are not eligible
17 for federal tax credits to make private health insurance in the Marketplace affordable.² Maintaining
18 access to employer-based health insurance is, therefore, an important driver for both individual and the
19 health of the communities where DACA grantees live and work.

20 3. Having health care coverage helps individuals get the appropriate care when needed,
21 including preventative services and primary care. Further, when kids and families receive necessary
22 preventative care they have better attendance in school and their parents are better able to work.
23 Without access to insurance, their health and the health of the community could be jeopardized.

24 _____
25 ¹ Tom K. Wong et al., *2017 National DACA Study* (last visited Oct. 10, 2017),
26 <https://cdn.americanprogress.org/content/uploads/2017/08/27164928/Wong-Et-Al-New-DACA-Survey-2017-Codebook.pdf>.

27 ² Dinah Wiley, *For DACA Grantees, Health Insurance Is (Only) a Dream*, Georgetown University
28 Health Policy Institute (Apr. 11, 2014), <https://ccf.georgetown.edu/2014/04/11/for-daca-youth-health-insurance-is-only-a-dream/>.

1 4. Getting the proper level of treatment in a timely manner helps reduce health costs for
2 everyone. California hospitals have worked hard to reduce costs through delivery system reform, care
3 coordination and clinical efficiencies. These innovations mean patients often recover quicker and can
4 return to work and home sooner. Lower utilization results in lower costs. When individuals and
5 families don't have health care coverage, they also lose access to care. Providers don't get paid to treat
6 uninsured individuals. When patients can't be seen by a primary care doctor, they often turn to hospital
7 emergency rooms—the most expensive place to be treated—as a last resort. Preserving emergency
8 rooms for those truly needing emergency care ensures life-saving treatment is there when needed for
9 everyone.

10 5. Caring for patients in the appropriate setting can lower costs and improve patient well-being.
11 Sometimes the hospital is not the appropriate level of care for patients. But when a patient is uninsured,
12 other providers such as nursing home, rehabilitative services or other post-acute care settings are not
13 willing to accept hospital patients unless there is a form of payment guaranteed. This means the
14 uninsured can stay in the hospital longer than what is needed, increasing costs for the entire health care
15 system. Patients recover quicker when they receive timely and appropriate care in the appropriate
16 setting. And, the proper level of treatment is often less costly.

17 6. Hospitals have not directly reported information to CHA as to whether or not they employ
18 DACA recipients. However, it is estimated that at least 4 percent of DACA recipients are working in
19 health care in some capacity.³ Further, an estimated 222,000 of the 800,000 total DACA recipients are
20 from California.⁴ This means that approximately 8,880 DACA recipients in California are working in
21 health care in some capacity. Many of those health care jobs could be in hospitals or health systems
22

23 _____
24 ³ Randy Capps, et al., *The Education and Work Profiles of the DACA Population*, Migration Policy
25 Institute, p. 6 (Aug. 2017), <https://www.migrationpolicy.org/research/education-and-work-profiles-daca-population>.

26 ⁴ USCIS, *Number of Form I-821D, Consideration of Deferred Action for Childhood Arrivals by Fiscal*
27 *Year, quarter, Intake Biometrics and Case Status Fiscal Year 2012-2017* (Mar. 31, 2017),
28 https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr2.pdf.

1 with hospitals. This is no small number for an industry already facing significant labor shortages. These
2 individuals are most likely serving diverse communities with health professional shortage designations,
3 like the central valley. In addition, 65 DACA recipients were enrolled in medical school in the 2016-
4 2017 school year, and an additional 113 DACA recipients had applied to medical school in 2016.⁵ There
5 are no specific estimates as to how many of the medical students are in California; however, given the
6 high percentage of DACA individuals in California and the high percentage of medical students that are
7 trained in the state, an estimate of one-third of those medical students are likely studying in California.
8 These future physicians are more likely to work in high-need areas where communities face challenges
9 in recruiting new physicians. DACA students are also more likely to be bilingual, come from diverse
10 cultural backgrounds, and understand the challenges of providing health care in diverse communities—
11 attributes that are underrepresented by today’s medical professionals. When communities are served by
12 medical professionals that understand the language and cultural sensitivities that are unique to them,
13 care is improved and better outcomes are achieved.

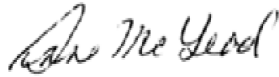
14 7. As the national debate continues over federal immigration policies, hospitals have reported
15 to CHA that there is a growing level of wariness and fearfulness from individuals who might need
16 medical care but do not seek care for fear of deportation or reporting. In response to this growing
17 concern, CHA developed a comprehensive toolkit of materials on hospital practices related to federal
18 immigration policies for member hospitals and health systems. The toolkit includes resources to help
19 hospitals communicate with their patients, employees and community stakeholders. The resources help
20 convey to patients that hospitals have always provided care to everyone in need, regardless of a person’s
21 ability to pay, the language they speak or their immigration status. It is important to preserve the health
22 of communities and protect the public’s health. If immigrant groups start avoiding institutions like
23 hospitals because they are fearful of the federal government learning of their status, the health of
24 communities could be at risk.

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27 ⁵ Sunny Nakae, et al., *Considerations for Residency Programs Regarding Accepting Undocumented*
28 *Students Who Are DACA Recipients*, Association of American Medical Colleges (2017),
https://undocu.ucsf.edu/sites/undocu.ucsf.edu/files/Considerations_for_Residency_Programs_Regarding_DACA_Recipients_2017.pdf.

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

Executed on October 24, 2017, at Sacramento, California.



ANNE MCLEOD

EXHIBIT 59

1 JEFFREY M. DAVIDSON (SBN 248620)
2 ALAN BERSIN (SBN 63874)
3 COVINGTON & BURLING LLP
4 One Front Street, 35th Floor
5 San Francisco, CA 94111-5356
6 Telephone: (415) 591-6000
7 Facsimile: (415) 591-6091
8 Email: j davidson@cov.com,
9 abersin@cov.com
10 *Attorneys for Plaintiffs The Regents of the*
11 *University of California and Janet Napolitano, in*
12 *her official capacity as President of the*
13 *University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
9 ETHAN D. DETTMER (SBN 196046)
10 JESSE S. GABRIEL (SBN 263137)
11 GIBSON, DUNN & CRUTCHER LLP
12 333 South Grand Avenue
13 Los Angeles, CA 90071-3197
14 Telephone: (213) 229-7000
15 Facsimile: (213) 229-7520
16 Email: tboutrous@gibsondunn.com,
17 edettmer@gibsondunn.com,
18 jgabriel@gibsondunn.com
19 *Attorneys for Plaintiffs Dulce Garcia, Miriam*
20 *Gonzalez Avila, Saul Jimenez Suarez, Viridiana*
21 *Chabolla Mendoza, Norma Ramirez, and Jirayut*
22 *Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 THE REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
23 University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
26 SECURITY and ELAINE DUKE, in her
27 official capacity as Acting Secretary of the
28 Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF NICK MELVOIN

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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

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COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, NICK MELVOIN, DECLARE:

2 1. I proudly serve on the Los Angeles Unified School District (“L.A. Unified”) Board of
3 Education (“Board”) as the elected Board Member for the District 4 communities, which include
4 portions of Hollywood, the San Fernando Valley and the Westside of Los Angeles. I also serve as the
5 Vice President of the L.A. Unified Board.

6 2. I have personal knowledge of the facts set forth in this declaration, and if called as a
7 witness, I could and would competently testify to them.

8 3. I understand that Plaintiff Saul Jimenez Suarez (“Mr. Jimenez”) is an undocumented
9 person serving as a special education teacher within an L.A. Unified school, and was hired as an intern
10 credentialed teacher with authorization to work through the Deferred Action for Childhood Arrivals
11 (“DACA”) program.

12 4. L.A. Unified has been at the forefront of ensuring that our students, families, employees,
13 and community—regardless of immigration status—are welcome and supported in our schools. This
14 includes L.A. Unified’s commitment to affording students a free public education aligned with the
15 United States Supreme Court case of *Plyler v. Doe*, which held that undocumented children have a
16 constitutional right to receive a free public K-12 education to become “self-reliant and self-
17 sufficient participant[s] in society” and to learn the “fundamental values necessary to the maintenance of
18 a democratic political system.”

19 5. L.A. Unified’s commitment is embodied in the numerous resolutions passed by the Board
20 in support of immigration reform.

21 6. For example, when DACA was implemented in 2013, the Board passed a resolution to
22 establish the “DREAMers Program,” a centralized process to assist students and graduates of L.A.
23 Unified to obtain educational histories to support their DACA applications. From 2013-2017,
24 approximately 21,000 students and graduates availed themselves of the program. This year, educational
25 records for 719 students have been requested. These figures alone show that L.A. Unified’s students,
26 graduates, and community will be significantly and irreparably impacted by the rescission of DACA.

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1 7. Additionally, on February 9, 2016, the Board passed a resolution entitled *LAUSD*
2 *Campuses as Safe Zones and Resource Centers*, which declared every L.A. Unified site a place of
3 support and resource for all students and families, regardless of immigration status.

4 8. The Board also adopted the *Reaffirmation of Los Angeles Unified School District as Safe*
5 *Zones for Families* resolution, which further propelled efforts to provide services to immigrant students
6 and their families, including, but not limited to, (1) a reference guide in the event ICE agents seek access
7 to students or student records; (2) a district-wide campaign to build awareness around immigrant
8 students' rights called *We Are One L.A. Unified: Standing with Immigrant Families*; (3) the Education &
9 Immigration Resource Guide outlining academic, legal, health and wellness, and enrollment information
10 for immigrant families and school communities; and, (4) opening a Center for Education & Immigration
11 Resources in each local district, where families can access information on immigration, enrollment,
12 healthcare services, and other supports.

13 9. After the September 5, 2017 announcement on the rescission of DACA, L.A. Unified
14 immediately distributed letters to schools, families, and employees about the termination of DACA and
15 provided referrals to legal resources. Superintendent Michelle King sent a letter to all employees
16 denouncing the Presidential Administration's decision to end DACA and declaring L.A. Unified's
17 unwavering support to all employees, including teachers in our classrooms and other employees, who
18 may be affected by the rescission of the program. We did this, in no small part, because we knew that
19 even this announcement of the rescission would have immediate, devastating consequences for the
20 students and families in our community.

21 10. Prior to serving as an L.A. Unified Board Member, I served as an L.A. Unified middle
22 school teacher for several years at Markham Middle School, initially serving through an intern
23 credential program in partnership with Teach For America, whereby I provided instruction while
24 simultaneously studying to obtain my teaching credential. This internship program is similar to the one
25 I understand Mr. Jimenez to be hired through.

26 11. In general, L.A. Unified hires intern credentialed teachers for hard-to-fill positions that
27 are experiencing teacher shortages, such as in the field of special education. These hires are essential to
28

1 the L.A. Unified given the shortage of qualified candidates in these fields, and we rely on these
2 employees to continue within our teaching force for years to come.

3 12. If employees like Mr. Jimenez do not have authorization to work, however, L.A. Unified
4 will not be able to hire or continue to employ such individuals to serve our students.

5 13. Without the availability of intern-credentialed teachers like Mr. Jimenez to work with
6 special education students, L.A. Unified might be forced to resort to staffing special education
7 classrooms with short or long-term substitute teachers, which I believe to be particularly detrimental to
8 these students' academic achievement as well as to their social and emotional development.

9 14. In addition to filling a high-need position, the shared experience between Mr. Jimenez
10 and our significant population of undocumented students is valuable in helping to ensure that our
11 schools create a safe and welcoming space for all in accordance with L.A. Unified's stated
12 commitments.

13 15. The impact of the rescission of DACA will be especially dramatic in places like
14 California—and Los Angeles in particular—where there is an incredibly high number of DACA
15 recipients working and serving in their respective communities.

16 16. L.A. Unified does not have a record of how many of its employees, including teachers
17 credentialed through internship programs or otherwise, are DACA recipients because employment
18 authorization documents do not provide that information and the District does not inquire about an
19 employee's immigration status. However, based on the number of employees who have self-identified
20 as DACA recipients and based on third-party studies of DACA recipients, we believe that a significant
21 portion of our educator workforce may have DACA status. For example, an August 2017 study by the
22 Migration Policy Institute found that, in 2014, approximately 14,000 "immediately eligible DACA
23 population" were in the Education, Training, and Library occupations, and I understand that a significant
24 portion of DACA participants reside in the Los Angeles Region.

25 17. Additionally, according to Teach for America, more than 190 corps members and alumni
26 have DACA status and reach 10,000 students across 11 states, including California and the Los Angeles
27 region specifically, where teachers largely are placed in L.A. Unified schools or charter schools that are
28 authorized and overseen by L.A. Unified and by myself as an L.A. Unified Board Member.

1 18. I believe that the rescission of DACA discriminates against this class of young
2 immigrants like Mr. Jimenez in violation of the Equal Protection guarantee of the Fifth Amendment by
3 depriving them of their substantial interests in pursuing a livelihood, including opportunities in higher
4 education.

5 19. I believe that the rescission of DACA will have a significant and negative impact on the
6 DACA participants amongst our teaching force, and on our students and families who rely on those
7 teachers to provide a high quality education and a supportive and welcoming environment.

8 20. I believe that the announcement of the rescission of DACA has already had an
9 immediate, significant, and negative impact on the DACA participants amongst our teaching force, and
10 on our students and families who rely on those teachers to provide a high quality education and a
11 supportive and welcoming environment. I have spoken with several teachers with DACA status and
12 they are particularly frustrated, dismayed, and discouraged because they used their DACA opportunity
13 to be able to give back to the community they felt had given them so much. The teachers I have spoken
14 with came to work at L.A. Unified after they were granted work authorization because they felt that L.A.
15 Unified and the community it supports provided them with opportunities for success. Those
16 opportunities are now unfairly being pulled out from underneath them. These teachers have offered
17 themselves as sources of comfort and as role models for students who are undocumented or who have
18 undocumented family—and now both our teachers and those students have extra anxiety, worry, and
19 stress to cope with on account of the recent announcement that DACA would be discontinued. The
20 educators I have spoken with are paralyzed with fear and are afraid to pursue any professional
21 opportunities outside of L.A. Unified, one of the increasingly few places they feel supported and
22 understood. Further, our students are now not only terrified that their family members may be swept
23 away, detained, deported, and disappeared at any moment, but that their trusted educators may be as
24 well.

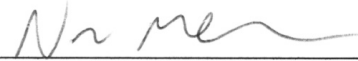
25 21. Every child deserves an opportunity to dream without boundaries and I will not watch
26 from the sidelines as this White House ignores the catastrophic implications of rescinding DACA.

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

Executed on October 29, 2017, in Los Angeles, California.



Nick Melvoin