

# **EXHIBIT 01**

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*

**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 KATHRYN ABRAMS**

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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, KATHRYN ABRAMS, DECLARE:

2 1. I am a professor of law at the University of California Berkeley (“UC Berkeley”). The  
3 matters set forth herein are true and correct of my own personal knowledge and, if called as a witness, I  
4 could and would testify competently thereto.

5 2. I have been a professor of law since 1985 and a professor at UC Berkeley for sixteen  
6 years. My research includes examination of dissident and performative citizenship in the undocumented  
7 immigrants’ rights movement, feminist jurisprudence, voting rights and constitutional law. I teach  
8 several classes at UC Berkeley, presently including *Law and Social Change: The Immigrant Rights*  
9 *Movement* and *Constitutional Law*. My primary research project right now is regarding the mobilization  
10 of the immigrants’ rights movement in Arizona, and in conjunction with this I have collaborated with  
11 undergraduate students through the Undergrad Research Apprenticeship Program (“URAP”).

12 3. I am currently working with Joel Sati, a Deferred Action for Childhood Arrivals  
13 (“DACA”)-recipient student. I first met Joel Sati during the Berkeley JSD admitted students’ day. He  
14 was a much sought after, promising candidate with an already distinguished academic record.

15  
16 **Joel’s Significant Contributions to My Class at UC Berkeley**

17 4. Joel is now my Graduate Student Instructor (“GSI”) for the course *Law and Social*  
18 *Change: The Immigrant Rights Movement*. Our class meets once a week for three hours for  
19 approximately 13 weeks during the semester. It includes about 20 students in their second through fourth  
20 years of college at UC Berkeley.

21 5. This fall my father became seriously ill, and I had to leave Berkeley to care for him in  
22 Michigan. This posed a serious challenge for delivering my classes as scheduled. I spoke to the Director  
23 of Legal Studies, and we decided I would work with several graduate students who could assist with the  
24 development of and support for the *Law and Social Change: The Immigrant Rights Movement* course.

25 6. I worked with Joel and another graduate student to prepare a lecture on the history of  
26 DACA and the modern immigrations rights movement, which they were scheduled to co-deliver without  
27 me. The night before the lecture, the other grad student unexpectedly dropped the commitment to teach  
28 the class. This left me in a difficult position, but Joel immediately stepped up to help. I taught the first

1 hour of class that the other graduate student was supposed to cover, then Joel taught the remaining two  
 2 hours of the class by himself. He successfully led the students in a discussion of early DREAM Act  
 3 legislation, including analysis of the legislation, elements of narratives invoked by DREAMERS, and the  
 4 pros and cons of these narrative choices that were used to appeal to legislators. As Joel explains so  
 5 eloquently, by focusing on the exceptional characteristics of certain DREAMERS, the narrative in  
 6 support of this type of legislation excluded other undocumented immigrants from legitimacy in the eyes  
 7 of the public and from the dialogue on broader immigration reform in the United States.

8 7. The following week, I checked-in with students on their lecture and discussions with  
 9 Joel. The students were deeply impressed by Joel's ability to bring the narrative complexity and  
 10 discussion to life. His experiences as an activist in the immigrants' rights movement—for example,  
 11 campaigning for the Maryland DREAM Act—were crucial to the class's understanding. Joel conveys  
 12 his personal narrative in a uniquely compelling way to students. I think the students found his class  
 13 discussions so meaningful because they can identify with Joel as a peer and role model, who is so  
 14 accomplished for his age and yet so similar to them. His first-hand perspective is invaluable.

15 8. Joel's perspective is incredibly unique and important not just for my class, but to our  
 16 entire field of study. He has a highly unusual trifecta of experience: he has a first-hand understanding of  
 17 what it means to be personally at risk and affected by immigration status; he has actively participated in  
 18 shaping legal rights for immigrants; and he is a distinguished scholar in citizenship theory. I study  
 19 individuals like Joel who are part of the movement, but I am not on the front lines myself, nor am I  
 20 personally an at-risk immigrant. I have never had the opportunity to co-teach with anyone that has Joel's  
 21 experiences before. Joel's unique background enables him to act as an essential bridge between the on-  
 22 the-ground immigrants' rights movements and broader academic theories of citizenship.

#### 23 24 **Harms to Joel, UC Berkeley and Myself from the DACA Rescission**

25 9. Not having Joel at UC Berkeley would be like losing a unique, bilingual language  
 26 speaker; Joel has the rare gift of speaking the immigrants' rights movement language and the language  
 27 of academia. I understand Joel is applying to law school, which will add a further layer of special  
 28 expertise to his research, making his perspective even more invaluable to the field.

1 10. Joel's work for me is particularly impressive given that he is already acting as a full-time  
2 GSI for another class with Professor Sarah Song. It is unusual to serve as a GSI for more than one class.  
3 It is even more unusual to take on the significant role of leading lectures and discussion as Joel has done  
4 for my class, particularly for a student, like Joel, who is just starting the second year of a Ph.D.

5 11. Joel's GSI position with my class requires employment authorization. Without DACA  
6 employment authorization, Joel will lose his GSI job. This would be a great loss for Joel and for me, as  
7 well as for the students in our class and for UC Berkeley, because of the rescission of the DACA policy.

8 12. Joel's ability to continue in his academic career is also jeopardized by the rescission of  
9 the DACA policy. The rescission has produced immediate harm to Joel. He was denied advance parole  
10 to attend prestigious academic conferences in Malta and Germany this fall because of the rescission of  
11 the DACA policy. It is vital for graduate students to attend such conferences in order to meet their peers  
12 and leading academics in their field and learn how to present their work. This is even more so in Joel's  
13 field of the international study of citizenship and migration, which by its nature necessitates  
14 international study and connections. The inability to travel internationally is a serious impediment to  
15 Joel's career. The rescission of DACA is a huge impediment to Joel establishing his academic profile  
16 and becoming the significant scholar that he is poised to be and has invested in becoming.

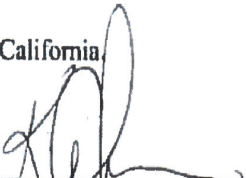
17 13. I have also engaged with other DACA recipient students who have provided meaningful  
18 insight and value to my academic research. For example, I collaborated with another DACA-recipient  
19 undergraduate student in conjunction with URAP, and in that role she helped me to understand the  
20 reluctance of undocumented populations to confront the mental health challenges engendered by the  
21 often precarious day-to-day uncertainty of their lives. Discussions with this student informed the  
22 questions that I asked in my later study of emotional strategies used in Arizona's immigrants' rights  
23 movements. This helped me to focus my attention on a specific project in Arizona that uses art to help  
24 undocumented persons heal from their experiences and provide them with tools to address their  
25 emotional trauma. I will be publishing a book on my Arizona research that will include examination of  
26 this approach to art and trauma for undocumented immigrants. I relied on DACA students' perspectives  
27 for this project, and they are the best-situated to assist with my research and framing for this book as I  
28



1 continue writing it. The rescission of the DACA policy means likely losing the contributions of these  
2 DACA students and their unique, firsthand insights that enrich my research at Berkeley.

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 25, 2017 in Berkeley, California

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KATHRYN ABRAMS

# **EXHIBIT 02**



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*  
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8 THEODORE J. BOUTROUS, JR. (SBN 132099)  
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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*  
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XAVIER BECERRA  
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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*

19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **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 JORGE A. AGUILAR**

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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, JORGE A. AGUILAR, declare:

- 2 1. I am the Superintendent of the Sacramento City Unified School District (“District”), a school  
3 district of more than 43,000 students with many immigrant students from all parts of the world.  
4 Students come from families that speak at least 48 different languages, including Spanish,  
5 Hmong, Armenian, Korean, Tagalog, Cantonese, Arabic, Vietnamese and Russian.
- 6 2. Sixty four percent (64%) of District students qualify for free or reduced lunch. 17,104 students  
7 are of Latino descent. In 2015-16, nearly one-third of students were English language learners or  
8 non-native speakers.
- 9 3. The repeal of DACA has negatively impacted many students' abilities to focus on their studies.  
10 When it was announced that DACA would end, many of those students became fearful of what  
11 the decision meant for them, their undocumented relatives and friends.
- 12 4. Many teachers in the District have reported their students experiencing trauma in the classroom  
13 because of this decision. It has been a major distraction in the classroom. In fact, the District has  
14 had to create a guide for teachers to help them manage students dealing with this trauma.  
15 Teaching and learning cannot happen in our classrooms if students' basic needs are not met.
- 16 5. If the DACA program were eliminated, it would have a severe impact on the District's students.  
17 The elimination of work authorization for parents and guardians would likely result in many  
18 students withdrawing from the District. Students and/or their parents could be subject to  
19 deportation, which would undoubtedly impact their long term academic success.
- 20 6. The DACA program has increased the diversity of the District's workforce as well. We have a  
21 number of employees, both credentialed and classified, with DACA status.
- 22 7. These employees have made meaningful connections with our students, especially those students  
23 who have shared cultural and linguistic backgrounds.
- 24 8. The District desires to retain and continue to hire any such individuals who can benefit its  
25 students and the District as a whole by adding to its diversity and improving educational  
26 outcomes for all students.

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

Executed on October 25, 2017, at Sacramento, California

  
\_\_\_\_\_  
Jorge A. Aguilar  
Superintendent, Sacramento City Unified School  
District

# **EXHIBIT 03**



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: jdavidson@cov.com,  
5 abersin@cov.com  
*Attorneys for Plaintiffs The Regents of the*  
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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*  
15 *Chabolla Mendoza, Norma Ramirez, and Jirayut*  
*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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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.  
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CASE NO. 17-CV-05211-WHA

**DECLARATION OF DAVID R. ANDERSON**

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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, DAVID R. ANDERSON, declare:

2 1. I am the President of St. Olaf College, a private liberal arts college in Northfield,  
3 Minnesota. I have held this position since July 2006. St. Olaf enrolls approximately 3,000 students  
4 from across the country and around the world.

5 2. St. Olaf's mission statement, among other things, commits it to be "an inclusive, globally  
6 engaged community." The phrase "inclusive, globally engaged community" dedicates St. Olaf to  
7 welcoming the people of the world and engaging with them. St. Olaf emphasizes learning in global  
8 contexts and welcomes students and scholars from many parts of the world. St. Olaf is also dedicated to  
9 being an inclusive college where people of diverse backgrounds and experiences can come together to  
10 share ideas and learn from one another.

11 3. Approximately 10 students who attend St. Olaf participate in the Deferred Action for  
12 Childhood Arrivals (DACA) program. These DACA students make valuable contributions to the St.  
13 Olaf community.

14 4. The rescission of DACA will negatively affect St. Olaf's ability to fulfill its mission  
15 statement. The rescission will impede St. Olaf's ability to foster relationships between people of  
16 different backgrounds because the DACA students, who bring diverse perspectives and experiences to  
17 the college, may be unable to afford tuition due to their loss of work authorization and may be subject to  
18 deportation. The potential deportation of these students and the rescission of their legal status goes  
19 against St. Olaf's commitment to diversity and inclusivity. Moreover, the rescission of DACA will  
20 adversely impact the diversity of the talent pool of potential St. Olaf students, which will make it more  
21 difficult for St. Olaf to fulfill its strategic plan of increasing the diversity of St. Olaf students.

22 5. The rescission of DACA will also negatively affect St. Olaf's tuition revenue. DACA  
23 students who are enrolled in St. Olaf may drop out because they are unable to work to meet their  
24 educational expenses, because they determine that the cost of a college education is not worth the  
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substantial investment of time and money if they are not able to work after graduation, or because they are deported. Additionally, the rescission of DACA will reduce the potential student population, decreasing the future stream of tuition revenue for St. Olaf.

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

Executed on 23 October, 2017, in Northfield, Minnesota.

  
DAVID R. ANDERSON



# **EXHIBIT 04**

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*

19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **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 RON ANDERSON**

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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, RON ANDERSON, declare:

2 1. I am the Senior Vice Chancellor of Minnesota State, a system of 37 colleges and  
3 universities with 54 campuses across the state of Minnesota. I have held this position since June 2015.  
4 Prior to my current position, I served as President of Century College, a large and diverse college within  
5 the Minnesota State system. The majority of my more than 25 year-long career in higher education has  
6 been spent serving within the Minnesota State system.  
7

8 2. As Minnesota State's chief academic and student affairs officer, I am in charge of  
9 leading the strategic planning, development, and administration of academic and student affairs,  
10 initiatives, programs, and policies in fulfillment of the system's commitments to Minnesota.  
11

12 3. Minnesota State is the fourth largest system of state colleges and universities in the  
13 country. Minnesota State does not include the University of Minnesota. Minnesota State offers higher  
14 education to more than 375,000 students every year. Minnesota State colleges and universities are  
15 dedicated to helping all Minnesotans improve their futures and to sustaining Minnesota's diverse and  
16 vibrant economy by supplying business and industry with a highly educated and skilled workforce.  
17 Minnesota State serves a diverse group of students, including 63,000 students of color, 48,500 first-  
18 generation college students, and 84,000 students with modest financial means.  
19

20 4. Minnesota State has an enduring commitment to enhancing Minnesota's quality of life by  
21 developing and fostering understanding and appreciation of a diverse society. It is Minnesota State's  
22 goal to recruit and retain diverse students, faculty, and staff and to ensure a welcoming and supportive  
23 environment on all of its campuses throughout the state. Minnesota State is committed to ensuring that  
24 its campuses are places of inclusion and opportunity for all students and employees. Minnesota State  
25 has long benefitted from the economic, scientific, and cultural contributions of students and scholars  
26 from diverse backgrounds.  
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# **EXHIBIT 05**

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 MARTHA AREVALO**

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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, Martha Arevalo, declare:

2 1. I am the Executive Director of the Central American Resource Center – CARECEN – of  
3 California, located in Los Angeles. CARECEN was founded by a group of Salvadoran  
4 refugees whose mission was to secure legal status for the thousands of Central Americans  
5 fleeing civil war. The organization became a 501(c)(3) nonprofit organization in 1983, and  
6 since that time has provided a range of social, educational, and legal services to refugees  
7 and immigrants from Central America and other Latin American countries who are living  
8 in the Los Angeles area.

9  
10 2. After serving on the board of directors for approximately 15 years, I became Executive  
11 Director in January of 2012. I have served in that capacity continuously since that time. I  
12 am responsible for administration of the organization, which consists of 85 total staff.

13  
14 3. From the time the Obama Administration announced the Deferred Action for Childhood  
15 Arrivals (“DACA”) program in June 2012, CARECEN has been deeply involved in  
16 DACA-related work. In July 2012, we convened the first large group of legal service  
17 providers in southern California to discuss various aspects of DACA legal service  
18 provision. Hundreds of individuals came to CARECEN for assistance each day in the  
19 initial weeks of the DACA application period in August 2012. Our organization filed  
20 nearly 1,200 applications from August through December 2012.

21  
22 4. DACA legal service provision has been a critical component of our work since that time.  
23 We filed nearly 1,000 DACA applications in 2017. We have engaged in numerous  
24 outreach events and efforts to inform at-risk youth in marginalized communities about  
25 DACA eligibility and assist them in the application process. For example, we hosted a law  
26 fellow for a two-year project that included providing ongoing advice and services to high  
27 school students in a college track program in East Los Angeles. We also provide legal  
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advice and services to students at DREAM Center student facilities at 3 colleges in the area.

5. Our organization has also facilitated several educational exchange programs for DACA beneficiaries. These educational exchanges allowed many Salvadoran, Guatemalan, and Mexican DACA beneficiaries to travel for the first time and participate in an international academic setting. For Salvadoran DACA beneficiaries, they were able to see their home country for the first time in memory or as an adult, and to learn about the history and culture of their country of origin from a distinctly Central American perspective. During the two-week trip, participants attended lectures by professors at the *Universidad de Centro America* in San Salvador. Following the trip, many participants were able to pursue additional academic avenues such as organizing academic conferences, attending graduate programs, and starting law school.

6. Needless to say, DACA-related services have become a major component of CARECEN's ongoing work, and DACA has been a significant piece of our strategic and budget planning processes since 2012. Our ability to provide sound advice and legal assistance to DACA beneficiaries has also allowed CARECEN to connect with a much larger number of families in the community, including many mixed-status households. This has benefitted the organization in numerous ways. For example, it has strengthened our ability to engage families in our Parent and Youth Center to become civically engaged in their communities.

7. The September 5, 2017 announcement regarding the phase out of the DACA program has impacted our organization in numerous ways. After continuing to provide DACA legal services for several months after the inauguration, we began to advise the community that the DACA program was an ongoing one.

1 8. CARECEN also planned another education exchange program for December 2017. This  
2 time, we included El Salvador, Guatemala and Mexico as destinations. With limited  
3 outreach about this opportunity, interest was extremely high and a much larger number of  
4 individuals applied to participate in the trip than we could accommodate. Staff spent  
5 considerable time vetting applications, interviewing participants, and organizing logistics  
6 (transportation, lodging, professor seminars, etc.). Part of the planning process included  
7 coordinating efforts between a local supporting university (University of California, Irvine)  
8 and the hosting university abroad (*Universidad de Centro America*). We also provided  
9 legal consultation to and submitted advance parole applications on behalf of each DACA  
10 beneficiary intending to participate in the exchange program. Applicants made initial  
11 payments to CARECEN for the trip. Twenty-three Advance Parole applications were  
12 received by USCIS on August 7, 2017 and remained pending when the Administration  
13 announced on September 5, 2017, that advance parole applications would no longer be  
14 approved.

15  
16 9. We serve a community that includes many low income, working poor and impoverished  
17 families. We often encounter former and prospective DACA clients whose work permits  
18 have expired due to their inability to afford the filing fee. We provided advice regarding  
19 eligibility to renew DACA up to one year from the expiration of one's existing DACA  
20 work permit in 2017. We provided that information to individuals who were later unable to  
21 renew their work permits because they expired before September 5, 2017. This includes at  
22 least one individual who attempted to renew after September 5<sup>th</sup> despite having an expired  
23 work permit. Her DACA renewal application was promptly rejected.

24  
25 10. Our legal department mailed three DACA renewal application via Fedex overnight express  
26 mail on Friday, September 1, 2017. While the USCIS received these applications on  
27 September 5, 2017, they were rejected. We resubmitted the applications with evidence that  
28 they had been received by September 5<sup>th</sup>, yet they were rejected again (at least one other

1 application also mailed on September 1<sup>st</sup> via Fedex from our Van Nuys office was accepted  
2 and processed by USCIS). We continue working to get USCIS to process the applications  
3 but have not been able to resolve the issue, which has created considerable stress for the  
4 affected clients, as well as our staff members involved in the cases.

5  
6 11. We also have a number of DACA beneficiaries on staff. The impact of the loss of these  
7 employees would be considerable. Roughly 10 percent of our staff are DACA  
8 beneficiaries. Some of these highly motivated staff members have worked at the  
9 organization for several years and have received considerable training for their respective  
10 positions. Identifying, hiring and training replacement staff would place a significant  
11 burden on the organization and I have no doubt that our productivity would suffer.  
12 Moreover, our entire staff has friends and/or family members who are DACA  
13 beneficiaries. Thus, the news of the termination of the program has had a direct impact on  
14 the organization. The angst and uncertainty surrounding the future of the DACA program  
15 escalated as reports about termination of the program began circulating in August.

16  
17 12. The September 5<sup>th</sup> announcement had an immediate impact on staff and community  
18 morale. We became the bearer of bad news to numerous individuals seeking to renew or  
19 apply for DACA for the first time. This included a boy who came to CARECEN weeks  
20 before the September 5<sup>th</sup> announcement. He was 14 years old at the time and thus not  
21 eligible to apply for DACA. He returned to our office on September 6<sup>th</sup>, having just turned  
22 15, only to be informed that he was no longer eligible to apply.

23  
24 13. The period between September 5, 2017 and the October 5, 2017 deadline for DACA  
25 renewals produced enormous stress for applicants and community members we interacted  
26 with, as well as legal staff. Legal staff put other obligations and casework on hold in order  
27 to focus on assisting DACA beneficiaries eligible to renew by the October 5<sup>th</sup> deadline, and  
28 to educate the community about the vast implications of the announced DACA phase out.


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Staff worked significant overtime hours in order to serve clients and attend numerous community information sessions and legal clinics that CARECEN sponsored or was invited to participate in. The volume of requests for participation by our attorneys and other legal staff was enormous, and we were unable to fulfill every request.

14. Staff endured considerable stress during the final one month renewal filing window. Some staff were directly affected by the announcement. Moreover, advising affected community and ensuring that last-minute legal assistance would be error-free produced considerable stress. We will spend the remainder of 2017 struggling to catch up on casework and other program priorities that were set aside temporarily to focus on DACA renewals. Meanwhile, the phase-out of the DACA program leaves considerable uncertainty around numerous aspects of the organization's work for the foreseeable future.

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

Executed on October 30, 2017, at Los Angeles, California.

  
\_\_\_\_\_  
Martha Arevalo

# **EXHIBIT 06**

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,

Plaintiffs,

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 IYARI ARTEAGA**



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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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**DECLARATION OF IYARI ARTEAGA**

I, IYARI ARTEAGA, declare as follows:

1. I work at the New Children’s Museum in San Diego, California. As a museum playworker, I am part of the exhibitions team, where I help develop and maintain museum exhibits and interact with museum visitors daily. I have had this job for about two years. Before this job, I taught theater and writing to high school students.

2. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would competently testify to them.

3. I met Dulce Garcia through a family friend a few years ago. I have come to know her well through my interactions with her in June of 2016, when she represented me in a dispute against an insurance company on a pro bono basis.

4. I was involved in a serious car accident in May 2016. I was not at fault and my car was totaled. I was extremely anxious to get compensated from the other driver’s insurance company because I needed to buy a replacement car as quickly as possible. I depend on a car to get to work and I cannot afford to lose my job, as it is my sole source of income. However, the other driver’s insurance company tried to blame me for the accident and refused to pay based on the misinformation provided to them by the other driver.

5. My dad recommended that I reach out to Dulce (he also knew her through the same family friend that I knew her through). I contacted her in early June of 2016, and told her about my situation. Dulce explained to me that this was a property damage case and not a personal injury case because no one was hurt. Because my car was worth about \$1900, she explained that paying an attorney on an hourly basis would quickly add up to the total amount of money I was seeking from the insurance company. I could not have afforded to pay an attorney that amount of money, or anything close to that. I was so grateful when Dulce then offered to represent me for no fee.

6. Dulce quickly resolved my dispute with the insurance company. Over the course of just two to three weeks, she got the insurance company to admit liability and to pay me \$1,000 in damages. I used the insurance money as part of a down payment to buy a new car.

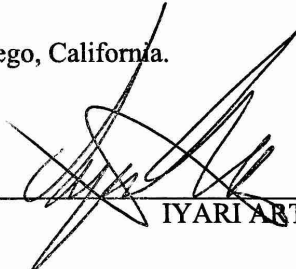
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7. Dulce's willingness to take my case on a pro bono basis meant so much to me and I will be forever grateful to her. She knew how anxious and stressed out I was at the prospect of not being able to buy a new car, and she took care of everything. I would not have been able to afford to pay a lawyer. I doubt that I could have resolved the case on my own, since I had already been unsuccessful in my dealings with the insurance company before Dulce got involved. By getting me the money to which I was entitled, Dulce relieved me of the incredible amount of stress I was under and helped me move on with my life after the accident.

8. Based on my interactions with Dulce, I can say that she is an effective lawyer who is extremely kind, supportive, and dedicated to serving her clients. The fact that Dulce volunteered her time to resolving my case showed me that she is committed to helping her community and using her gifts as a lawyer to help people fight the injustices in their lives, regardless of their economic status.

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 27, 2017, in San Diego, California.

  
\_\_\_\_\_  
IYARI ARTEAGA

# **EXHIBIT 07**

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,  
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

CASE NO. 17-CV-05211-WHA

**DECLARATION OF JHOANA ASCENCION  
VAZQUEZ**



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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, JHOANA ASCENCION VAZQUEZ, DECLARE:

2 1. I am a sixth grade teacher at the KIPP Academy of Innovation in Los Angeles through  
3 Teach for America. I make this declaration based on my personal knowledge. If called as a witness, I  
4 could and would testify competently on the facts stated herein.

5 **My Background**

6  
7 2. I was born in Mexico. My parents brought me to the United States when I was two years  
8 old. They both started working at a young age to help their families, so they were not able to achieve  
9 high levels of education. My mom's highest education is elementary school, and my dad only went up  
10 to middle school. My parents wanted their children to have a better education, so we could have more  
11 opportunities and lead more secure lives than they had. I have two younger siblings, a brother and a  
12 sister, both of whom were born here and are U.S. citizens.

13  
14 3. I have known I was undocumented since I was small. I grew up in constant fear of being  
15 deported. I would watch the news and see raids going on, and I remember thinking that the government  
16 could come after me or my family next. I was raised to always remember that I could never step out of  
17 line. Any little mistake I made could end up with my family being separated. This anxiety continues to  
18 this day, even though I currently have DACA and am vocal about my identity as an undocumented  
19 person.

20  
21 4. Going to college has been a driving force for me since middle school. I thought that if I  
22 went to college, I would finally be accepted by others as a true American. I would also have the ability  
23 to help my family financially.

24 5. The first time I hit an institutional barrier because of my undocumented status was when I  
25 was applying for the POSSE scholarship, a scholarship dedicated to people who show academic and  
26 leadership potential. I was nominated to apply for this scholarship by Inner City Struggle for my work  
27 promoting restorative and educational justice. When I went for my first interview, I was told that I  
28

1 could not apply because I was not a citizen or a permanent resident and I was not in the process of  
2 becoming one. I broke down crying and left.

3 6. My family did not want me to give up on my dream of going to UCLA, but I did not want  
4 to put any financial burden on them. I continued to apply for scholarships, hoping that some of them  
5 would not require a Social Security Number or green card. Determined not to add any unnecessary  
6 financial strain for my family, I paid for my first two years of college mostly through scholarships. For  
7 one quarter, my parents had to help me cover tuition and my friends helped to support me in purchasing  
8 books. I commuted to school from home in order to save money, spending 3-4 hours every day on a bus  
9 because I was unable to get a driver's license. I could not join many school clubs because they met in  
10 the evenings, and it was unsafe for me to take the bus home so late.

11  
12 **My Interactions with Miriam Gonzalez Avila**

13 7. I first met Miriam Gonzalez Avila when we were in the second grade at summer school.  
14 We grew up in the same neighborhood, Boyle Heights. We reconnected in a meaningful manner in  
15 2011, when we seniors in high school we attended the Immigrant Youth Empowerment Conference,  
16 hosted by the IDEAS organization at UCLA, a group dedicated to serving the undocumented student  
17 population. We formed a bond over our shared identity as undocumented people.

18 8. Miriam and I had both been accepted to UCLA at that point, so we continued to check in  
19 with each other. We were both struggling to figure out how we were going to pay for school and helped  
20 each other come up with ideas. We also commuted on the bus together and did some orientation  
21 programs at the same time.

22 9. Once we were at UCLA, we both joined the IDEAS organization. Miriam and I were  
23 project directors for the community service component of IDEAS. After DACA was announced, one of  
24 our responsibilities as project directors was sharing information about DACA in local communities. For  
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1 instance, we put on a workshop together in our neighborhood of Boyle Heights. Miriam took the lead  
2 on preparing the talking points and drove people to the workshops.

3 10. During the workshops, we often received a lot of questions on whether information that is  
4 provided as part of the DACA application process would be shared with immigration enforcement  
5 authorities. Based on these questions, it was apparent that the people eligible for DACA and their  
6 parents were scared that the government was going to use the information provided in DACA  
7 applications to arrest and deport them and their families. We were nervous about answering these  
8 questions, but chose to believe the government's promise that it would not use this information against  
9 applicants and their families.

10  
11 11. To this day, Miriam and I remain close. We check in with each other at least once a  
12 month, and more often recently, to talk about our lives and the challenges we face. Since we are both  
13 teachers, we finally have the ability to provide resources to our community that we did not have growing  
14 up. Miriam in particular has dedicated her life to this effort, and despite all the difficulties I have faced  
15 as an undocumented person, I am very thankful that my identity has allowed me to meet Miriam, who  
16 continues to inspire me to be a better teacher, leader, and person.

17  
18 **How DACA Has Benefited Me**

19 12. In November 2012, Miriam and I applied for DACA on the same day. I waited to apply  
20 because I was nervous about giving the government my personal information. I also had to save up to  
21 afford the application fee. I wanted to make sure I paid my tuition and bought my books, bus pass, and  
22 supplies before finding money for the application. My parents had to help me pay for part of the fee.

23  
24 13. I renewed DACA in October 2014, and then again in October 2016. The fact that I could  
25 renew was really important to me. Renewing my DACA status allows me to come up with long-term  
26 plans about what I was going to do in the future and plans to help my family gain stability. I was finally  
27 able to think about getting a white-collar job that requires a work permit, instead of being limited to  
28

1 working a blue collar job like my parents. My parents and I always hoped that I could get a white-collar  
2 job because of those jobs tend to be safer, more stable, higher-paying, and require more skill.

3 14. DACA changed my life. Getting a driver's license allowed me to integrate more into my  
4 community at UCLA because I was able to commute with a car, which saved me a lot of time and was  
5 safer than riding the bus at night.

6 15. I got my first job in July 2014. I worked as a parking attendant at the UCLA campus.  
7 Since then, I have continued holding jobs and I now work as a teacher through Teach For America. My  
8 financial stability has helped my family immensely. We are finally able to save instead of living  
9 paycheck to paycheck, and this was possible because of my status as a DACA beneficiary.

10 16. I took out my first loan this year. I am excited to build my credit so I can apply for a  
11 credit card and one day own a home. I was able to do this because of my DACA status.

12 17. On top of the financial benefits, DACA has also helped me finally feel like I am  
13 accepted, a feeling that I have been searching for my whole life. I traveled on an airplane to a different  
14 state for the first time in November 2016. Before DACA, I was too nervous to fly with a Mexican  
15 passport because I was afraid of being stopped by the police.

16 **How the Rescinding DACA Affects Me**

17 18. What hurt the most about hearing about the rescission of DACA was feeling that my  
18 existence was still not being validated after all these years of hard work. I became a teacher to try to  
19 engage more students of color in sciences because I believe that is critical to this country's future. But  
20 at the same time now there are people saying that I am not an American. I cried that day. I am back to  
21 feeling unwelcome and unaccepted. And I am scared about the future.

22 19. If DACA is rescinded, the students I teach will be affected. My Teach For America  
23 commitment does not end until the end of the school year in June 2019. When my work permit expires  
24



1 in March 2019, I may lose my job and I am worried about who will teach my students. My students are  
2 already vulnerable.

3 20. If DACA is rescinded, my family will suffer greatly. I still heavily support my family  
4 financially, and if I lose my authorization to work, I will not be able to get a higher paying job. My  
5 brother is still in school, and I help him pay for books. I will also be helping him pay his tuition moving  
6 forward. And, my sister has mental health issues and depends greatly on me and my mother. I help her  
7 pay for food while she pays her medical bills. I am also saving money to help her pay for a more  
8 intensive, and very expensive, treatment. Without my steady income, she will not be able to pay for this  
9 treatment.  
10

11 21. Now that the government has my personal information, I am worried about my parents or  
12 me being deported. My family has always been very close. We are basically alone here, and we have  
13 never lived apart. The five weeks I spent in Arizona for my Teach For America training was the longest  
14 time I had been away from my family, and it was very difficult for me. I cannot imagine what we will  
15 do if I am separated from my siblings. My sister needs me here, as my brother is too young to support  
16 her if she has a serious incident involving her mental health. I have lost sleep worrying about what will  
17 happen if my family is separated.  
18

19 22. I am concerned about my finances. I had planned to travel around the U.S. over the next  
20 few years to meet new people and gain new experiences because I have spent almost my entire life in  
21 Los Angeles. But now, I have to save up for the uncertainty of the future.  
22


23 23. My dreams are on hold, and maybe gone forever. I am no longer planning to apply to  
24 graduate school, which I had hoped would propel me to teach at the college level in the future.

25 24. Having lived here all my life, I do not have a strong connection to anyone in Mexico. My  
26 family members in Mexico are strangers to me, even if they are my blood relatives. My life is here, my  
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1 family is here, and my friends are here. It causes me a lot of anxiety to think about my life being  
2 completely uprooted if DACA is rescinded.  
3

4 I declare under penalty of perjury that the foregoing is true and correct.  
5

6 Executed on October 30, 2017, in Los Angeles, California.  
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9 JHOANA ASCENCION VAZQUEZ  
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# **EXHIBIT 08**

1 GIBSON, DUNN & CRUTCHER LLP  
2 THEODORE J. BOUTROUS, JR., SBN 132099  
3 tboutrous@gibsondunn.com  
4 KATHERINE M. MARQUART, SBN 248043  
5 kmarquart@gibsondunn.com  
6 JESSE S. GABRIEL, SBN 263137  
7 jgabriel@gibsondunn.com  
8 333 South Grand Avenue  
9 Los Angeles, CA 90071-3197  
10 Telephone: (213) 229-7000  
11 Facsimile: (213) 229-7520

PUBLIC COUNSEL  
MARK D. ROSENBAUM, SBN 59940  
mrosenbaum@publiccounsel.org  
JUDY LONDON, SBN 149431  
jlondon@publiccounsel.org  
610 South Ardmore Avenue  
Los Angeles, CA 90005  
Telephone: (213) 385-2977  
Facsimile: (213) 385-9089

7 ETHAN D. DETTMER, SBN 196046  
8 edettmer@gibsondunn.com  
9 555 Mission Street  
10 San Francisco, CA 94105  
11 Telephone: (415) 393-8200  
12 Facsimile: (415) 393-8306

13 Attorneys for Plaintiffs DULCE GARCIA,  
14 MIRIAM GONZALEZ AVILA, SAUL  
15 JIMENEZ SUAREZ, VIRIDIANA CHABOLLA  
16 MENDOZA, NORMA RAMIREZ, and  
17 JIRAYUT LATTHIVONGSKORN

18 *[Additional Counsel Listed on Next Page]*

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

22 DULCE GARCIA, MIRIAM GONZALEZ  
23 AVILA, SAUL JIMENEZ SUAREZ,  
24 VIRIDIANA CHABOLLA MENDOZA,  
25 NORMA RAMIREZ, and JIRAYUT  
26 LATTHIVONGSKORN,

27 Plaintiffs,

28 v.

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

36 Defendants.

CASE NO. 17-CV-05380-WHA

**DECLARATION OF PAMELA BECKWITH**

Action Filed: September 18, 2017

Hon. William H. Alsup

1 Additional Counsel for Plaintiffs

2 BARRERA LEGAL GROUP, PLLC  
3 LUIS CORTES ROMERO, SBN 310852  
4 lcortes@barreralegal.com  
5 19309 68th Avenue South, Suite R102  
6 Kent, WA 98032  
7 Telephone: (253) 872-4730  
8 Facsimile: (253) 237-1591

9 LAURENCE H. TRIBE, SBN 39441  
10 larry@tribelaw.com  
11 Harvard Law School  
12 \*Affiliation for identification purposes only  
13 1575 Massachusetts Avenue  
14 Cambridge, MA 02138  
15 Telephone: (617) 495-1767

16 ERWIN CHEMERINSKY, *pro hac vice* forthcoming  
17 echemerinsky@law.berkeley.edu  
18 University of California, Berkeley School of Law  
19 \*Affiliation for identification purposes only  
20 215 Boalt Hall  
21 Berkeley, CA 94720-7200  
22 Telephone: (510) 642-6483

23 LEAH M. LITMAN, *pro hac vice* forthcoming  
24 llitman@law.uci.edu  
25 University of California, Irvine School of Law  
26 \*Affiliation for identification purposes only  
27 401 East Peltason Drive  
28 Irvine, CA 92697  
Telephone: (949) 824-7722

**DECLARATION OF PAMELA BECKWITH**

I, PAMELA BECKWITH, declare as follows:

1. I am the Human Resources Manager at Public Counsel. I have been in this position since August, 2006.

2. In my role as Human Resources Manager, I oversee Public Counsel's compliance with employment-related legal requirements and supervise the onboarding of new employees, and am responsible for verifying employment eligibility for individuals who work at Public Counsel.

3. In order to be in compliance with federal law, Public Counsel verifies identity and work authorization for each person it hires by using the Form I-9. I ensure proper completion of the Form I-9 for each individual Public Counsel hires. In connection with this process, an employee must attest to his or her employment authorization and present acceptable documents that evidence identity and employment authorization.

4. Public Counsel is unable to hire immigrants who do not have the necessary documentation to satisfy the requirements set out in the Form I-9.

5. Viridiana Chabolla worked at Public Counsel from May 2013 to July 2017.

6. I ensured that Ms. Chabolla satisfactorily completed a Form I-9 in connection with her employment at Public Counsel. In order to complete her form I-9, Ms. Chabolla presented her employment authorization card. She also presented her renewed employment authorization cards in 2014 and 2016 to be eligible to continue working at Public Counsel. Attached as Exhibit "A" is Ms. Chabolla's I-9 form, which includes copies of her employment authorization cards.

7. It is my understanding that Ms. Chabolla has a social security number and Employment Authorization Document because she is a DACA recipient. Without documents verifying her work eligibility, she would not have been able to complete the Form I-9 and Public Counsel would not have been able to hire her.

8. If Ms. Chabolla were to lose her work authorization through DACA and did not have other means of establishing her eligibility to work in the United States, Public Counsel would be unable to hire her in the future.

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

3  
4 Executed on October 26, 2017, in Los Angeles, California.

5  
6   
7 PAMELA BECKWITH

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# **EXHIBIT A**



**Employment Eligibility Verification**  
 Department of Homeland Security  
 U.S. Citizenship and Immigration Services

**USCIS**  
**Form I-9**  
 OMB No. 1615-0047  
 Expires 03/31/2016

▶ **START HERE.** Read instructions carefully before completing this form. The instructions must be available during completion of this form.  
**ANTI-DISCRIMINATION NOTICE:** It is illegal to discriminate against work-authorized individuals. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.

**Section 1. Employee Information and Attestation** (Employees must complete and sign Section 1 of Form I-9 no later than the first day of employment, but not before accepting a job offer.)

|  |   |   |                           |                            |  |                        |
|--|---|---|---------------------------|----------------------------|--|------------------------|
| Last Name (Family Name)<br><i>Chabolla-Mendoza</i> |   | First Name (Given Name)<br><i>Viridiana</i> |                           | Middle Initial<br><i>S</i> | Other Names Used (if any)<br><i>Viridiana Chabolla</i> |                        |
| Address (Street Number and Name)<br>[REDACTED]     |   |   | Apt. Number<br>[REDACTED] | City or Town<br>[REDACTED] | State<br>[REDACTED]                                    | Zip Code<br>[REDACTED] |
| Date of Birth (mm/dd/yyyy)<br>[REDACTED]           | U.S. Social Security Number<br>[REDACTED] | E-mail Address<br>[REDACTED]                |                           |                            | Telephone Number<br>[REDACTED]                         |                        |

I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.

I attest, under penalty of perjury, that I am (check one of the following):

- A citizen of the United States
- A noncitizen national of the United States (See instructions)
- A lawful permanent resident (Alien Registration Number/USCIS Number): \_\_\_\_\_

An alien authorized to work until (expiration date, if applicable, mm/dd/yyyy) 12/6/2014. Some aliens may write "N/A" in this field. (See instructions)

For aliens authorized to work, provide your Alien Registration Number/USCIS Number OR Form I-94 Admission Number:

1. Alien Registration Number/USCIS Number: \_\_\_\_\_

**OR**

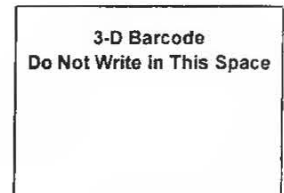
2. Form I-94 Admission Number: \_\_\_\_\_

If you obtained your admission number from CBP in connection with your arrival in the United States, include the following:

Foreign Passport Number: \_\_\_\_\_

Country of Issuance: \_\_\_\_\_

Some aliens may write "N/A" on the Foreign Passport Number and Country of Issuance fields. (See instructions)



|  |                                      |
|--|--------------------------------------|
| Signature of Employee: <i>Viridiana Chabolla</i> | Date (mm/dd/yyyy): <i>05/29/2013</i> |
|--|--------------------------------------|

**Preparer and/or Translator Certification** (To be completed and signed if Section 1 is prepared by a person other than the employee.)

I attest, under penalty of perjury, that I have assisted in the completion of this form and that to the best of my knowledge the information is true and correct.

|                                      |  |                         |                    |          |  |
|--------------------------------------|--|-------------------------|--------------------|----------|--|
| Signature of Preparer or Translator: |  |                         | Date (mm/dd/yyyy): |          |  |
| Last Name (Family Name)              |  | First Name (Given Name) |                    |          |  |
| Address (Street Number and Name)     |  | City or Town            | State              | Zip Code |  |

STOP
**Employer Completes Next Page**
STOP

**Section 2. Employer or Authorized Representative Review and Verification**

(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR examine a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents" on the next page of this form. For each document you review, record the following information: document title, issuing authority, document number, and expiration date, if any.)

Employee Last Name, First Name and Middle Initial from Section 1:

| List A<br>Identity and Employment Authorization                   | OR | List B<br>Identity                    | AND | List C<br>Employment Authorization    |
|---|----|---------------------------------------|-----|---------------------------------------|
| Document Title:<br><b>Employment Authorization Card</b>           |    | Document Title:                       |     | Document Title:                       |
| Issuing Authority:<br><b>U.S. Citizenship &amp; Imm. Services</b> |    | Issuing Authority:                    |     | Issuing Authority:                    |
| Document Number:<br>[REDACTED]                                    |    | Document Number:                      |     | Document Number:                      |
| Expiration Date (if any)(mm/dd/yyyy):<br><b>12/06/2014</b>        |    | Expiration Date (if any)(mm/dd/yyyy): |     | Expiration Date (if any)(mm/dd/yyyy): |
| Document Title:   |    |                                       |     |                                       |
| Issuing Authority:  |    |                                       |     |                                       |
| Document Number:  |    |                                       |     |                                       |
| Expiration Date (if any)(mm/dd/yyyy):                             |    |                                       |     |                                       |
| Document Title:   |    |                                       |     |                                       |
| Issuing Authority:  |    |                                       |     |                                       |
| Document Number:  |    |                                       |     |                                       |
| Expiration Date (if any)(mm/dd/yyyy):                             |    |                                       |     |                                       |

3-D Barcode  
Do Not Write in This Space

**Certification**

I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee's first day of employment (mm/dd/yyyy): **05/28/2013** (See instructions for exemptions.)

|   |  |   |                   |
|---|--|---|-------------------|
| Signature of Employer or Authorized Representative<br><i>Patricia Beckwith</i>                | Date (mm/dd/yyyy)<br><b>05/29/2013</b> | Title of Employer or Authorized Representative<br>Human Resources Manager |                   |
| Last Name (Family Name)<br>Beckwith   | First Name (Given Name)<br>Patricia    | Employer's Business or Organization Name<br>Public Counsel                |                   |
| Employer's Business or Organization Address (Street Number and Name)<br>610 S. Ardmore Avenue | City or Town<br>Los Angeles            | State<br>CA   | Zip Code<br>90005 |

**Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)**

|  |   |
|--|---|
| A. New Name (if applicable) Last Name (Family Name) First Name (Given Name) Middle Initial | B. Date of Rehire (if applicable) (mm/dd/yyyy): |
|--|---|

C. If employee's previous grant of employment authorization has expired, provide the information for the document from List A or List C the employee presented that establishes current employment authorization in the space provided below.


|   |                                |  |
|---|--------------------------------|--|
| Document Title:<br><b>EMPLOYMENT AUTHORIZATION CARD</b> | Document Number:<br>[REDACTED] | Expiration Date (if any)(mm/dd/yyyy):<br><b>10/30/2016</b> |
|---|--------------------------------|--|

I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

|   |   |  |
|---|---|--|
| Signature of Employer or Authorized Representative:<br><i>Patricia Beckwith</i> | Date (mm/dd/yyyy):<br><b>11/17/2014</b> | Print Name of Employer or Authorized Representative:<br><b>PATRICIA BECKWITH</b> |
|---|---|--|

\* SEE ATTACHED REVERIFICATION - 10/05/2018

CHABOLLA MENDOZA VIRIDIANA S 04 Apr 1003



*Viridiana S. Chabolla*

Surname  
**CHABOLLA MENDOZA**

Given Name  
**VIRIDIANA S**

USCIS# [REDACTED] Category/Card# [REDACTED]

Country of Birth  
MEXICO

Terms and Conditions  
None

Date of Birth [REDACTED] Sex  
F

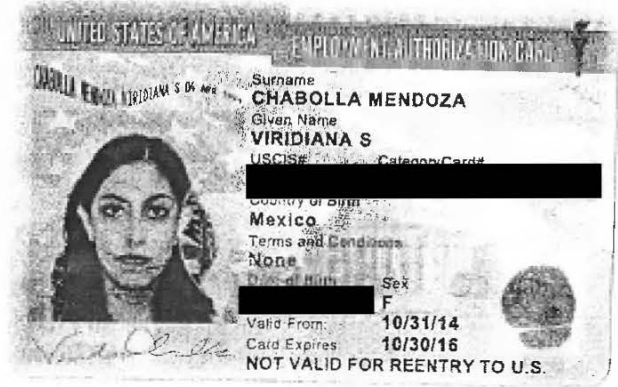
Valid From: **12/07/12**

Card Expires: **12/06/14**

**NOT VALID FOR REENTRY TO U.S.**











**Section 2. Employer or Authorized Representative Review and Verification**

*(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR examine a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents" on the next page of this form. For each document you review, record the following information: document title, issuing authority, document number, and expiration date, if any.)*

Employee Last Name, First Name and Middle Initial from Section 1: CHABOLLA MENDOZA, VIRIDIANA S.

| List A<br>Identity and Employment Authorization | OR | List B<br>Identity                    | AND | List C<br>Employment Authorization    |
|---|----|---------------------------------------|-----|---------------------------------------|
| Document Title:                                 |    | Document Title:                       |     | Document Title:                       |
| Issuing Authority:                              |    | Issuing Authority:                    |     | Issuing Authority:                    |
| Document Number:                                |    | Document Number:                      |     | Document Number:                      |
| Expiration Date (if any)(mm/dd/yyyy):           |    | Expiration Date (if any)(mm/dd/yyyy): |     | Expiration Date (if any)(mm/dd/yyyy): |
| Document Title:                                 |    |                                       |     |                                       |
| Issuing Authority:                              |    |                                       |     |                                       |
| Document Number:                                |    |                                       |     |                                       |
| Expiration Date (if any)(mm/dd/yyyy):           |    |                                       |     |                                       |
| Document Title:                                 |    |                                       |     |                                       |
| Issuing Authority:                              |    |                                       |     |                                       |
| Document Number:                                |    |                                       |     |                                       |
| Expiration Date (if any)(mm/dd/yyyy):           |    |                                       |     |                                       |

3-D Barcode  
Do Not Write in This Space

**Certification**

I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee's first day of employment (mm/dd/yyyy): \_\_\_\_\_ (See instructions for exemptions.)

|  |  |                         |  |  |
|--|--|-------------------------|--|--|
| Signature of Employer or Authorized Representative                   |  | Date (mm/dd/yyyy)       | Title of Employer or Authorized Representative |  |
|  |  |                         | Human Resources Manager                        |  |
| Last Name (Family Name)  |  | First Name (Given Name) |  | Employer's Business or Organization Name |
| Beckwith   |  | Pamela                  |  | Public Counsel                           |
| Employer's Business or Organization Address (Street Number and Name) |  |                         | City or Town                                   | State                                    |
| 610 S. Ardmore Avenue  |  |                         | Los Angeles                                    | CA                                       |
|  |  |                         | Zip Code                                       |  |
|  |  |                         | 90005  |  |

**Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)**

|  |  |  |   |
|--|--|--|---|
| A. New Name (if applicable) Last Name (Family Name) First Name (Given Name) Middle Initial |  |  | B. Date of Rehire (if applicable) (mm/dd/yyyy): |
|  |  |  |   |

C. If employee's previous grant of employment authorization has expired, provide the information for the document from List A or List C the employee presented that establishes current employment authorization in the space provided below.

|                                      |                  |                                       |
|--------------------------------------|------------------|---------------------------------------|
| Document Title:                      | Document Number: | Expiration Date (if any)(mm/dd/yyyy): |
| <u>EMPLOYMENT AUTHORIZATION CARD</u> | [REDACTED]       | <u>10/05/18 2018</u>                  |

I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

|   |                    |  |
|---|--------------------|--|
| Signature of Employer or Authorized Representative: | Date (mm/dd/yyyy): | Print Name of Employer or Authorized Representative: |
| <u>Pamela Beckwith</u>                              | <u>10/27/2016</u>  | <u>PAMELA BECKWITH</u>                               |



# **EXHIBIT 09**

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*  
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 BILL BLAZAR**

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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, BILL BLAZAR, declare:

2 1. My name is Bill Blazar. I am the Senior Vice President of Public Affairs and  
3 Business Development for the Minnesota Chamber of Commerce. I have been employed with the  
4 Chamber since 1992. The Chamber is Minnesota's largest business organization, representing more  
5 than 2,300 businesses in Minnesota.

6 2. The growth rate of the Minnesota workforce is declining, due in part to shifting  
7 demographics. Minnesota's workforce is aging and has insufficient natural growth to sustain the  
8 development and expansion of Minnesota's economy. As a result, there is a shortage of skilled workers  
9 in Minnesota.

10 3. Rescinding DACA will have an adverse impact on Minnesota businesses.  
11 Nationwide, the Deferred Action for Childhood Arrivals (DACA) program allows nearly 800,000 young  
12 people who were brought to the United States as children to work and study without the threat of  
13 deportation. DACA has empowered a number of these residents to join the Minnesota workforce.  
14 Many DACA recipients are employed by Minnesota businesses in a variety of fields. Depriving DACA  
15 recipients of their work authorization will further exacerbate Minnesota's workforce shortage.

16 4. Minnesota businesses have hired and retained DACA recipients because of their  
17 qualifications, skills, and contributions to their workforces. The rescission of DACA will cause DACA  
18 recipients to lose their work authorization, resulting in Minnesota businesses losing the important skills  
19 of these employees. Minnesota businesses will lose their investment of time and resources in their  
20 DACA recipient employees and will incur expenses in hiring, training, and managing new employees.

21 5. Nationwide, DACA recipients contribute to the global competitive advantage of  
22 the United States. DACA recipients help alleviate the shortage of skilled workers in Minnesota. The  
23 rescission of DACA will harm some Minnesota businesses.

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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 24 October, 2017, in St. Paul, Minnesota.

  
BILL BLAZAR

# **EXHIBIT 10**

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 DR. CLARENCE  
BRADDOCK III**

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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, CLARENCE BRADDOCK III, DECLARE:

2 1. I am Vice Dean of Education at the David Geffen School of Medicine at the University of  
3 California Los Angeles (“UCLA Medicine”). The matters set forth herein are true and correct of my  
4 own personal knowledge and, if called as a witness, I could and would testify competently thereto.

5 2. I have been Vice Dean of Education at UCLA Medicine for nearly four years. In my  
6 position, I oversee all aspects of medical education, including undergraduate, graduate, and postgraduate  
7 medical programs. I develop, manage, and implement strategies, initiatives and programs to promote  
8 and support education and training.

9 3. We have several Deferred Action for Childhood Arrivals (“DACA”) status medical  
10 students at UCLA Medicine, including 4th year medical students. The David Geffen School of  
11 Medicine, like the wider University of California system, is dedicated to providing a place for students  
12 who are the most qualified, meritorious and committed to their medical training and future patient care.  
13 The DACA students currently enrolled at the David Geffen School of Medicine exemplify these  
14 qualities. They are emblematic of our fundamental role as an institution of higher learning: to train the  
15 most talented, hard-working, passionate young scholars to become the doctors and biomedical  
16 researchers of tomorrow, regardless of gender, race, ethnicity or citizenship. These students are here not  
17 because of their DACA status, but because they are exceptionally qualified and share a genuine desire to  
18 care for, and heal, the sick.

19 4. If these UCLA medical student and residents lose their DACA status, they become  
20 unemployable as physicians. They will not be able to practice medicine or even complete their residency  
21 in the United States as both require employment authorization. Without DACA, these students and  
22 residents would have no choice but to leave the United States in order to become practicing physicians.  
23 This would result in a loss of promising young doctors from our medical care system.

24 5. The DACA policy rescission has also created the specific risk that our fourth year  
25 students will not be offered medical residency positions. Because they will lose their employment  
26 authorization without DACA status, they will be unable to complete or potentially even start their  
27 residency programs. Our faculty and UCLA residency program advisors have shared with me their  
28 significant concern about DACA students losing their status before or during residency, which means

1 that our hard-working and bright DACA students might not be offered residency interviews and/or  
2 positions at all. This concern has become so acute that UCLA Medicine has offered to include language  
3 in the Dean's Letter for our fourth year students explaining DACA status and expressing our support for  
4 our DACA students. A Dean's Letter is provided to fourth year students applying for residency to  
5 describe each student's potential as a doctor and encourage their acceptance into a residency program.  
6 This language is being included in hopes it might help DACA students be considered for residency  
7 programs.

8         6. Our DACA students have played an important role in enriching UCLA Medicine's  
9 educational environment and curriculum. At UCLA Medicine, we consider cultivating a diverse  
10 academic community as a way to drive excellence. A significant part of a medical student's training as a  
11 future physician is cultural sensitivity and a thoughtful, candid, respectful connection with patients,  
12 community members, and peers. Our DACA students come from incredibly diverse backgrounds and in  
13 my experience have helped their peers to build a more culturally sensitive and competent educational  
14 environment by sharing their perspectives and shaping our curriculum. For example, DACA students  
15 have provided unique insight on delivering care to immigrant populations, stemming from their  
16 understanding of both the American health system and the challenges immigrant families and  
17 communities often face. Our DACA students are often able to draw on their own and their family's  
18 experiences—in a way their peers cannot easily do—to provide context for the patient's choices and the  
19 right approach to delivering health care to that patient. As a medical educator, I believe that first-hand  
20 perspectives help all of our students to develop essential empathy and cross-cultural understanding that  
21 makes them better doctors for California's diverse population.

22         7. Our DACA students' unique perspectives have also driven specific improvements in our  
23 curriculum. Among the foundational concepts of our medical curriculum are understanding concepts  
24 like implicit bias, stereotype threat, and micro-aggressions. Our DACA students brought to UCLA  
25 Medicine's attention that some of our own case studies contained stereotypical descriptions and bias in  
26 the terms used to describe a minority patient and, in another case, a migrant worker. This started  
27 conversations about the existence of stereotypes and bias in the healthcare environment led by DACA  
28 students, which sparked changes to these cases in our curriculum.



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8. Because of the DACA policy rescission, I believe we will see fewer diverse applicants to our programs from students who would otherwise have received DACA. This frustrates UCLA Medicine's concerted effort to recruit diverse students through programs like Programs in Medical Education ("PRIME"). UCLA PRIME is a five-year concurrent/dual degree program focusing on the development of leaders in medicine by addressing policy, care and research in healthcare for medically underserved communities. We look for candidates who have leadership experience and are experienced with and committed to working with underserved populations. DACA students often have all of these qualifications. About one third of our current UCLA Medical DACA students are also PRIME program students. The rescission of the DACA policy frustrates UCLA Medicine's efforts to select and train these talented future leaders of medical care for Californians.

9. Finally, I am concerned that the rescission of the DACA policy will have a broader negative impact on the UCLA community, particularly if any DACA recipients become the target of immigration enforcement. Recent news reports of immigration agents arresting undocumented individuals in courthouses and hospitals or near schools have already caused concern among our community. Our undocumented patients may choose to stay at home rather than seek the medical help they need in the face of this heightened immigration enforcement risk.

10. The decision to rescind the DACA policy harms our DACA recipient students, their peers, UCLA Medicine, their future patients and our broader community.

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 Los Angeles.

  
\_\_\_\_\_  
CLARENCE BRADDOCK III

# **EXHIBIT 11**

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 IKE BRANNON, PH.D.  
AND LOGAN ALBRIGHT**

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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 We, Ike Brannon and Logan Albright, declare:

2 1. I, Ike Brannon, am currently an economist who is president of the consulting firm Capital  
3 Policy Analytics. I also have an affiliation with the Cato Institute as a visiting fellow. I received my  
4 MA and Ph.D. in Economics from Indiana University. I was an economics professor in the University  
5 of Wisconsin System from 1994-2002. In 2001 I was given tenure and promoted to associate professor.  
6 Since then I have worked in Washington DC, for (in order) the Office of Management and Budget, the  
7 Congressional Joint Economic Committee, The Senate Finance Committee, The U.S. Treasury, and the  
8 House Energy and Commerce Committee. In 2008, I was chief economist for the John McCain for  
9 president campaign.

10 2. My coauthor, Logan Albright, received his Master's Degree in economics in 2011 from  
11 Georgia State University, and has worked as a policy analyst in Washington, DC for the last five years,  
12 including positions at think tanks and policy organizations such as the American Action Forum,  
13 FreedomWorks, Free the People, and Capital Policy Analytics.

14 **Economic and Fiscal Cost of Repealing DACA**

15 3. Whereas the President has expressed a desire to end Deferred Action for Childhood  
16 Arrivals (DACA) program, we conducted a thorough investigation of the costs that such action would  
17 impose on the federal government as well as to the economy as a whole. We published that research in  
18 January 2017.

19 4. Whereas California contains a disproportionately high number of DACA recipients, we  
20 recently updated our analysis to examine that state, using data from the USCIS from September 4, 2017.  
21 We also examined the states of Maryland and Minnesota.

22 5. We began our analysis by comparing DACA recipients to those immigrants who hold H-  
23 1B visas. These are highly-skilled, well-educated immigrants who are demographically analogous to  
24 DACA students, all of whom must necessarily enroll in higher education programs in order to be  
25 eligible.

26 6. The average DACA recipient is 23 years old, employed, and a student. 17 percent of  
27 them are on track to complete an advanced degree. The college attrition rate of DACA recipients is  
28

1 miniscule compared to domestic students<sup>1</sup>, an indication of the exceptional caliber and motivation of the  
2 DACA students. H-1B holders are generally between 25 and 34, employed, and most have completed  
3 degrees. In short, we posit that they look like what DACA recipients will look like in a few years' time.

4 7. We begin our analysis by using a study from the Hoover Institute<sup>2</sup> on the economic  
5 impact of expanding the H-1B visa program as our baseline. We adjusted that estimate by the difference  
6 in the number of recipients and the difference in relative incomes. To conform to the conventions of the  
7 federal budget we then compiled a ten year aggregate cost.<sup>3</sup>

8 8. We determined that if DACA recipients were completely analogous to H-1B holders their  
9 removal would constitute a budgetary loss of \$127 billion and a GDP loss of \$512 billion. The loss is the  
10 result of DACA recipients losing their legal employment and taking jobs in the underground economy,  
11 where few of them would pay income or payroll taxes. DACA recipients are also ineligible for most  
12 forms of federal assistance, including SNAP, CHIP, TANF, the Affordable Care Act, Medicaid, and  
13 Social Security Disability Insurance. Additionally, DACA recipients only become eligible for Social  
14 Security Retirement Benefits and Medicare after working and paying taxes for ten years, as well as  
15 reaching retirement age.<sup>4</sup> Lack of eligibility for federal benefits means that DACA recipients will cost  
16 the government less on average than a citizen.

17 9. We adjusted for the fact that DACA recipients, being younger and not completely done  
18 with their education, have an income on average roughly 43 percent of what H-1B holders earn. What's  
19 more, the population of DACA recipients is about 689,800 compared to the 660,000 H-1B holders the  
20 Hoover study examined, for which we also adjusted.

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24 <sup>1</sup> Data provided to us from TheDream.US indicates that first year college attrition rate for those who participate in their  
program is under 5%.

25 <sup>2</sup>[http://www.hoover.org/sites/default/files/uploads/aafs/2013/05/Estimating-the-Economic-and-Budgetary-Effects-of-H-1B-  
Reform-In-S.744.pdf](http://www.hoover.org/sites/default/files/uploads/aafs/2013/05/Estimating-the-Economic-and-Budgetary-Effects-of-H-1B-Reform-In-S.744.pdf)

26 <sup>3</sup> We believe that our implicit assumption that the wage growth of DACA recipients will mirror that of H-1B workers is quite  
conservative, given that DACA recipients are younger--which is when wage growth is highest.

27 <sup>4</sup> "DACA and DAPA Access to Federal Health and Economic Support Programs," [National Immigration Law Center](#) (Jan.  
28 30, 2015).



1           10.     According to a survey done by Center for American Progress, 91 percent of DACA  
2 recipients are employed, a number that rises to 93 percent if we exclude persons under 25 years old.<sup>5</sup> In  
3 the general population the labor force participation rate—the most directly comparable labor market  
4 statistic—is 63.1 percent as of September 2017, according to the [Bureau of Labor Statistics](#).

5           11.     From this, we determined that, over a ten-year window, a repeal of DACA would cost the  
6 federal government \$60 billion in lost revenue and the economy as a whole \$215 billion in lost GDP.

7           12.     As a way of confirming our result, we compared our results to a study that looks at  
8 foreign-born U.S. workers<sup>6</sup> that was done by the National Research Council.<sup>7</sup> The study points out that  
9 immigrants become more productive over time as they learn new skills and become more fluent in  
10 English. The authors concluded that the average immigrant will have a net long-term impact on state,  
11 local and federal budgets of \$80,000, which includes tax payments as well as the impact of the children  
12 of immigrants, who tend to be less costly—and higher-earning—than their parents. Multiplying this  
13 estimate by the number of DACA recipients produces an estimated fiscal impact of \$59.3 billion, which  
14 is very close to our result of \$60 billion.

15           13.     Residents in the state of California earn an average income higher than that of the country  
16 as a whole. Using Bureau of Labor Statistics data, we adjusted the results to reflect the incomes  
17 California DACA recipients are likely to earn.

18           14.     California has the highest share of DACA recipients of any state at 197,900 or 28.7  
19 percent of the total DACA population. Making all the adjustments discussed above, for population, age,  
20 and income, we estimate the economic cost of ending DACA in California over a ten year window to be  
21 \$71 billion and the fiscal cost to government revenue to be \$19 billion. This sums a total cost of \$90  
22 billion, the highest cost of any state.

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26 <sup>5</sup> Tom K Wong et al, “DACA Recipients’ Economic and Educational Gains Continue to Grow,” [Center for American Progress Report](#) (Aug. 28, 2017).

27 <sup>6</sup> The study includes both legal and illegal immigrants.

28 <sup>7</sup> James P. Smith and Barry Edmonston, editors, “The New Americans: Economics, Demographic, and Fiscal Effects of Immigration,” National Academies Press (Washington: NAP, 1997), p. 346.



# **EXHIBIT A**

10/28/2017

About – Capital Policy Analytics

## Capital Policy Analytics

A consultancy that provides economic analysis to businesses both in the U.S. and abroad regarding how government policies affect markets and the broader economy.

### About

Capital Policy Analytics is a consultancy that provides economic analysis to businesses both in the U.S. and abroad regarding how government policies affect markets and the broader economy.

We offer three services that we believe cannot be found together anywhere else:

- An innate knowledge of Congress and the Administration, the issues before them, and the constraints that they operate under.
- The ability to write clearly and succinctly, in a way that will grab and keep the attention of harried Congressional staffers and Administration officials.
- A large network of affiliated scholars that together have an expertise that cuts across all aspects of economic policy.

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### The Team

IKE BRANNON – Ike Brannon is the President of Capital Policy Analytics. He is currently a visiting Senior Fellow at the Cato Institute specializing in fiscal policy, tax reform, and regulatory issues and the head of the Savings and Retirement Foundation and the Prosperity Caucus. Ike was previously a senior fellow at the George W. Bush Institute and before that was director of economic policy for the American Action Forum. Prior to that he spent nearly a decade in government, serving as the chief economist for the House Energy and Commerce Committee, chief economist for the Republican Policy Committee,

10/28/2017

About – Capital Policy Analytics



senior adviser for tax policy at the U.S. Treasury, principal economic adviser for Senator Orrin Hatch on the Senate Finance Committee, Chief Economist for the Joint Economic Committee, and a senior economist for the Office of Management and Budget. He was also chief economist for the John McCain campaign in 2008 as well as an associate professor of economics at the University of Wisconsin, Oshkosh.

Ike has a Ph.D. in economics from Indiana University and a B.A. in math, Spanish, and economics from Augustana College in Rock Island, Illinois.



LOGAN ALBRIGHT – Logan Albright is the Director of Fiscal Research for Capital Policy Analytics. He received his M.A. in Economics from Georgia State University and a B.A. from Oberlin College. He was previously a research analyst for Freedomworks and the American Action Forum in Washington, DC. He has been published by The Weekly Standard, Real Clear Policy, The Daily Caller, Doublethink Magazine, Red State and the George W.

Bush Presidential Center. He is a contributing editor to the Von Mises Institute and a scholar at the Savings and Retirement Foundation.

# **EXHIBIT 12**

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: jdavidson@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 SHAWN BRICK**



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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  
7 BEAUREGARD SESSIONS, in his official  
8 capacity as Attorney General of the United  
9 States; ELAINE DUKE, in her official  
capacity as Acting Secretary of the Department  
of Homeland Security; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,

10 Defendants.

CASE NO. 17-CV-05813-WHA

1 I, SHAWN BRICK, DECLARE:

2 1. I am the Associate Director for Student Financial Support at the University of California  
3 Office of the President (“UCOP”). The matters set forth herein are true and correct of my own personal  
4 knowledge and, if called as a witness, I could and would testify competently thereto.

5 I have held various positions in student financial aid and admissions in the University of California  
6 (“UC”) system for fifteen years and am currently the Associate Director for Student Financial Support at  
7 the UCOP. As Associate Director for Student Financial Support, my duties include policy analysis,  
8 development, and implementation. I am responsible for producing complex analyses, executive  
9 summaries, and talking points on UC enrollment and affordability of UC education.

10 2. This declaration describes UC’s population of undocumented students and students who  
11 have Deferred Action for Childhood Arrivals status (“DACA students”), and the financial investment  
12 UC has made in those students. It then explains the investment that UC expects undocumented and  
13 DACA students (and their families) to make in their own education. It then provides figures on UC’s  
14 investment in graduate students. Finally, it provides the average debt of professional students upon  
15 graduation from UC. The rescission of the DACA program puts at risk the financial investment that UC  
16 and these students and families have made in their education.

17 3. UC’s mission includes provision of public undergraduate, graduate, and professional  
18 education. A key measure of our success is the percentage of entering students who complete their  
19 degrees. DACA students have earned their positions in programs at UC through their academic merit  
20 and accomplishments. UC invests in all its students, including DACA students, to enable them to  
21 continue their programs, complete their degree(s), graduate and become contributing members of  
22 society, including pursuing the careers for which UC trained them.

23 4. As described below, the University has provided financial support to its DACA and  
24 undocumented students enrolled as of the 2016-2017 academic year in the cumulative amount of  
25 between approximately \$87 million to \$252 million since 2013. The same students and their parents  
26 would have to have invested approximately \$73 million to \$180 million over the same period.

27

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**UC's Undocumented and DACA Students**

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2 5. As of the 2016-2017 academic year, UC had approximately 4,200 potentially  
3 undocumented students, of which approximately 1,700 students are likely to be DACA recipients.

4 6. This assessment is based on an analysis of several criteria in our financial aid data that  
5 suggest students are undocumented, and additional criteria suggesting that they have DACA status. To  
6 approximate the 4,200 undocumented student population, I considered that undocumented students are  
7 not eligible for federal financial aid, but, if they are eligible for the California nonresident tuition  
8 exemption under California Assembly Bill 540 ("AB540") then undocumented students (and only  
9 undocumented students) may choose to file a California DREAM (Development, Relief, and Education  
10 for Alien Minors) financial aid application. For the 4,200 students who meet this criteria, I then applied  
11 additional criteria to approximate the subset of 1,700 students who appear to have DACA work  
12 authorization.

13 7. This approach is likely to underestimate the number of undocumented students and,  
14 therefore, the number of students with DACA status at UC. For example, this figure would not include  
15 students who do not or cannot submit a California DREAM Act application for various reasons, or for  
16 whom we cannot identify likely work authorization for various reasons. It also excludes many graduate  
17 and professional students because the same criteria cannot be applied to accurately identify these  
18 students.

19  
20 **UC and State Investment in DACA Students**

21 8. Based on my assessments of undocumented and DACA student populations, I  
22 approximate UC's financial investment in these students cumulatively from 2013 to the 2016-2017  
23 academic year, including state grants and other sources. UC awards financial aid to students on a non-  
24 discriminatory basis according to students' financial need, as they demonstrate that need by submitting a  
25 Free Application for Federal Student Aid ("FAFSA") (not applicable to undocumented students or  
26 DACA students, who are ineligible for federal aid) or a California DREAM Act application.

27 9. UC has invested cumulatively between \$87 million (based on the DACA only estimate of  
28 1,700 students) and \$252 million (based on the 4,200 undocumented estimate) in the DACA students

1 who were pursuing degrees at UC as of the 2016-2017 academic year (based on dollar figures from  
2 preliminary 2016-2017 data). This is the approximate, cumulative investment in the cohort of  
3 undocumented and DACA students enrolled as of 2016-2017 at UC, over the course of their enrollment  
4 at UC from 2013 to the 2016-2017 academic year. The estimates are from 2013 onward because this was  
5 the earliest year that California DREAM Act data was received by UC, and it was this data that enabled  
6 me to assess the populations of undocumented and DACA student populations as described above.

7  
8 **UC Expectation of Student and Parent Investment in DACA Students' Education**

9 10. All students and their parents are expected to invest in paying for the student's college  
10 education. UC's financial aid policy for undergraduates approaches paying for the total cost of  
11 attendance (tuition, fees, living expenses, books and supplies) as a partnership between parents, students,  
12 state and federal governments, and UC. Parents and students are expected to contribute based on their  
13 resources as reported on either the FAFSA (not applicable to undocumented students or DACA students,  
14 who are ineligible for federal aid) or the California DREAM Act application. UC then uses the same  
15 formula for all students to determine financial aid, based on demonstrated financial need. The average  
16 expected parent contribution for the 4,200 undocumented students was roughly \$700 per year, as  
17 calculated using this same formula for all students, based on financial need.

18 11. UC also expects all students that are financial aid recipients to contribute "self-help"  
19 amounts to their education through work or loans in the amount of \$10,000 per year. Many students  
20 who have DACA work authorization hold jobs to satisfy this portion of their financial obligation.  
21 Without DACA work authorization, it will be much more difficult for undocumented students to satisfy  
22 the self-help contribution that UC expects of all students.

23 12. The combined expected family investment is therefore \$10,700 per year by students and  
24 parents, or \$42,800 for a completion of a four-year undergraduate degree. For our DACA and  
25 undocumented students, this totals between approximately \$73 million (based on the DACA-only  
26 estimate of 1,700 students) and \$180 million (based on the 4,200 potentially undocumented estimate).

**Average Investment Graduate Academic and Professional Students**

13. Because financial aid often works differently in UC graduate and professional programs, I am unable to accurately estimate our population of undocumented or DACA graduate and professional students based on financial aid records. However, UC believes that there are enrolled graduate and professional students who are DACA students.

14. The University invests heavily in its graduate academic and professional students. In 2015-2016, UC paid \$523 million in University-funded fellowships to all of its graduate and professional students.

15. Graduate students are primarily supported through fellowships and employment as research and teaching assistants. In 2015-2016, UC’s graduate academic students received an average combined fellowship and assistanceship award of more than \$37,000 per student per year, including any graduate DACA students.

16. By contrast, professional degree students primarily finance their degree by investing themselves through student loans. The UCOP tracks student loan borrowing patterns by professional students to estimate students’ debt incurred for their own degrees. The average student loan debt for professional students is as follows, by program:

**Average Professional Student Debt Upon Graduation**

| Degree Type              | Cumulative Borrowing, 2015-2016 Graduating Cohort |
|--------------------------|---|
| Law                      | \$124,000   |
| MBA                      | \$81,000  |
| Medicine                 | \$154,000   |
| Education                | \$37,000  |
| Other Health Professions | \$112,000   |
| Other Non-Health         | \$54,000  |

17. Without DACA, it will be difficult if not impossible for many of these graduate and professional students to complete their degrees and then to repay their significant debt from those degrees. Some of these degrees require work experience as a condition of graduation, such as a researcher or graduate student instructor. Further, without DACA, these students will lose the

1 employment authorization that enabled them to work in their chosen profession at a salary

2 commensurate with the debt incurred for their advanced degree.

3  
4 **Conclusion**

5 18. As indicated above, this assessment of investments of UC and its students in their  
6 education are conservative in many respects and the actual investment in undocumented and DACA  
7 students is likely greater.

8 19. The rescission of DACA puts in jeopardy the cumulative financial investments in the  
9 education of these talented students by the UC, the State of California, their families and the students  
10 themselves, as well as the ability of students to repay the debt incurred to pursue their education.

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

13 Executed on October 23, 2017 in Oakland, California.

14  
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17 SHAWN BRICK



# **EXHIBIT 13**

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: jdavidson@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@cpmllegal.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 NATALIE CARDENAS**

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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 **DECLARATION OF NATALIE CARDENAS**

2 I, NATALIE CARDENAS, declare as follows:

3 1. I am a legal assistant at the Garcia Law Firm in Chula Vista, California. The Garcia Law  
4 Firm, headed by Dulce Garcia, offers representation to clients in immigration, civil litigation, and  
5 criminal defense cases. I have had this position since July 31, 2017, and my responsibilities include  
6 assisting Dulce with drafting declarations, client intake, correspondence and accounting, and various  
7 discovery-related tasks, such as production of documents.

8 2. I have personal knowledge of the facts set forth in this declaration, and if called as a  
9 witness, I could and would competently testify to them.

10 3. I graduated from San Diego State University in May of 2017, with a bachelor's degree in  
11 criminal justice and a minor in psychology. I plan to go to law school to realize my life-long dream of  
12 becoming a lawyer.

13 4. I have come to know Dulce quite well because I work with her on a daily basis. She  
14 supervises my work and I regularly observe her interacting with clients and potential clients. I consider  
15 her a mentor because we have had numerous conversations about my career ambitions. I admire her and  
16 find her truly inspiring. She has shown me that my dream of becoming a lawyer is within reach.

17 5. As an aspiring lawyer, I have been fortunate to observe Dulce and learn how a lawyer  
18 should carry herself and what it means to be an effective advocate. Dulce is also a role model for me  
19 because she comes from a disadvantaged background, just like I do, and yet she has overcome this and  
20 other obstacles to be where she is now—a successful lawyer with her own thriving law practice.

21 6. Dulce has a unique ability to connect to her clients, and the manner and competence with  
22 which she communicates with them have taught me what it means to be a good lawyer. Moreover, the  
23 fact that she herself is a Latina immigrant enables her to foster trust with clients from similar  
24 backgrounds who come to her for help with immigration issues.

25 7. Dulce is selfless. Even with her busy schedule, she always finds time for community  
26 service and pro bono work. For example, despite the fact that she has been going through a lot of stress  
27 herself as a DACA recipient who may lose her status due to the government's announcement that it will  
28 rescind DACA, she held two free informational workshops for other DACA recipients. At these

1 workshops, which were held on September 16 and September 23, 2017 at our office in Chula Vista,  
2 Dulce assisted DACA recipients with filling out their DACA renewal applications for free. I assisted  
3 Dulce during one of these workshops.

4 8. I have had numerous and lengthy conversations with Dulce about the many hardships she  
5 has experienced as an undocumented immigrant and what it has meant for her to have DACA status.  
6 Dulce has explained to me that, because she did not have legal status growing up, she struggled to obtain  
7 things that were easily accessible to others. For example, because Dulce did not have a social security  
8 number, she told me that she was not eligible to obtain a California driver's license and therefore could  
9 not drive. She told me that her high school guidance counselor told her to give up her dreams of going  
10 to college because she was an illegal immigrant. She also told me that not having valid work  
11 authorization prevented her from obtaining internships and jobs, like the rest of her peers were doing  
12 around her. Despite these obstacles—and on top of growing up poor—Dulce told me how she worked  
13 her way through college and law school.

14 9. Since getting her DACA status, Dulce has established her own law firm with two  
15 offices—one in San Diego and another in Chula Vista, which she recently opened. Between the two  
16 offices, Dulce currently has over 70 active cases. Over half of these pending cases are immigration-  
17 related. The majority of the firm's clients are native Spanish speakers. Dulce has told me that, as an  
18 immigrant, she feels an obligation to practice immigration law to help individuals in her community. In  
19 fact, she told me that she opened her second office in Chula Vista because Chula Vista has a larger  
20 concentration of immigrants than San Diego, and therefore there is a greater need for immigration  
21 lawyers.

22 10. During our numerous conversations, Dulce has also told me that she relied on her DACA  
23 status and the ability to renew that status to invest her time and resources into establishing her law firm  
24 in San Diego. In connection with opening her own law practice, Dulce has hired employees and has  
25 made obligations to represent clients. Dulce currently has over 70 active cases, so over 70 clients are  
26 relying on Dulce to represent them in their legal disputes.

27 11. It is devastating for me to think that if Dulce's DACA status is rescinded, she may be  
28 deported and lose everything she has accomplished, including her law practice, which is her livelihood



1 and the culmination of her lifetime dream. If she were to be deported to Mexico, she would also lose her  
2 family, friends, and community in the United States. She has also told me that she has no family or  
3 friends in Mexico, so she will have to start a new life there from scratch and without any support.

4 12. If Dulce's DACA status is terminated, I also fear that I will lose my job. The majority of  
5 Dulce's clients are those with immigration cases and Dulce would be putting herself at risk for  
6 detention by immigration authorities if she attended her client's immigration hearings. Therefore, my  
7 understanding is that a significant portion of Dulce's clients will have to find other lawyers to represent  
8 them if Dulce loses her DACA status. Since Dulce pays me my salary out of the fees she collects from  
9 paying clients, Dulce will be unable to pay my salary if she does not have enough clients.

10 13. If Dulce loses her DACA status, not only would I lose a job I love and that provides me  
11 with a good income, but I would lose an important mentor and friend who has already enriched my life  
12 in so many ways.

13  
14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.

16 Executed on October 27, 2017, in San Diego, California.

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20 NATALIE CARDENAS  
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**EXHIBIT 14**

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 VIRIDIANA  
CARRIZALES**

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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, Viridiana Carrizales, 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  
3 called as a witness, I could and would testify competently thereto.

4 2. I am the Managing Director of DACA Corps Member Support at Teach For America  
5 (TFA).

6 3. Teach For America finds, develops, and supports a diverse network of leaders who  
7 expand opportunity for children from classrooms, schools, and every sector and field that shapes the  
8 broader systems in which schools operate. We recruit remarkable and diverse individuals to become  
9 teachers in low-income communities. They commit to teach for two years and are hired by our partner  
10 public schools across the country. During these two years, they are called TFA corps members. Since  
11 1990, when our program began, we have brought over 56,000 talented teachers and leaders to  
12 classrooms in low-income communities across America, including in the States of California,  
13 Maryland, and Minnesota.

14 4. Teach For America is a tax-exempt organization under section 501(c)(3) of the Internal  
15 Revenue Code. While we operate in 53 regions within 36 states and the District of Columbia, and are  
16 qualified to do business in 42 states and D.C., we are only incorporated in one state, Connecticut,  
17 where we were incorporated as a nonprofit corporation in 1989. TFA is managed and controlled by a  
18 Board of Directors; a Chief Executive Officer supervises, manages and controls the general day-to-  
19 day administration of TFA, subject to the oversight of the Board. Our headquarters is in New York  
20 City.

21 5. Deferred Action For Childhood Arrivals (DACA) allows qualified young adults to apply  
22 for DACA status and receive renewable, two-year work permits and temporary relief from  
23 deportation. DACA is life-altering for young immigrants, who are able to work, obtain driver's  
24 licenses, get health insurance, open bank accounts and provide for their families.

25 6. As one of our nation's leading recruiters of teachers in receipt of DACA for public  
26 schools, Teach For America has an interest in maintaining DACA because it allows talented, diverse  
27 college graduates to serve as teachers and leaders.

28

1           7. In 2013, Teach For America was among the first organizations to recruit college  
2 graduates with DACA status into the workforce. Our first DACA cohort consisted of two teachers  
3 hired in one district.

4           8. Since 2013, our DACA cohort has grown. Nationwide, as of the first day of school in  
5 2017, 188 Teach For America alumni and corps members with DACA status are working in  
6 classrooms to expand educational opportunities for more than 10,000 students in 11 states, including  
7 California. Another 10 DACA alumni are promoting equity in the nonprofit, corporate, and higher  
8 education sectors, including one enrolled in medical school and four on staff at Teach For America.

9           9. In the State of California, there are currently 28 DACA TFA corps members and 25  
10 DACA TFA alumni. All 53 corps members and alumni impact thousands of students in California.

11           10. In keeping with TFA's mission, our DACA teachers work in shortage-area subjects and  
12 hard-to-staff schools. Some examples: Miriam teaches reading and math at a STEM-focused middle  
13 school in Los Angeles, where she uses project-based lessons to instill a love of STEM learning in her  
14 students. Her aim is to help more students from low-income communities graduate prepared for  
15 STEM colleges and careers by providing them early opportunities to learn and apply math and science  
16 in age-appropriate, real-life scenarios. For example, in a recent lesson on ratios, students used applied  
17 STEM skills to make homemade ice cream. Jose teaches 7<sup>th</sup> grade math in Los Angeles. He works to  
18 instill a love for math in his students on a daily basis, and aims to incorporate its relevance to their  
19 lives in his lessons. For example, last year, students in Jose's class read about women and people of  
20 color in STEM, researched a STEM career they would be interested in pursuing in the future, and  
21 applied rational number concepts they had learned throughout the trimester to argue the importance of  
22 diversity in STEM related fields. These are just two examples--many of our DACA teachers are  
23 bilingual, focused on STEM, or they bring Ivy League educations to the classroom. Many others serve  
24 as role models and navigators for students who face the intersecting challenges of poverty and  
25 undocumented status.

26           11. If DACA ends, or the administration stops approving or renewing DACA applications,  
27 DACA teachers and leaders, including over 200 TFA alumni and corps members with DACA status,  
28 would lose their ability to work and would be at risk of deportation—a far cry from the pathway to

1 citizenship these individuals deserve. Ending DACA would severely undercut TFA's national effort  
2 to increase academic success among all students, but particularly undocumented students, since we've  
3 learned that DACA teachers provide tremendous help to undocumented youth as they navigate the  
4 barriers they face; students would lose the chance to connect with teachers who mirror their life  
5 experiences and act as remarkable role models.

6 12. Ending DACA without a solution in place would have other far-reaching impacts on our  
7 students and communities. Many K-12 students in the United States are undocumented or have one  
8 undocumented parent at home. If DACA is rescinded, they will lose the legal pathway to driver's  
9 licenses, jobs, and higher education. They could be separated from their families or deported to  
10 countries they've never known as home.

11 13. Teach For America is proud of the impact our DACA leaders have made on our corps,  
12 communities, and country. We will continue to provide them legal assistance and financial support  
13 during this time of uncertainty.

14  
15 I declare under penalty of perjury under the laws of the United States that the foregoing is  
16 true and correct and that this declaration was executed on October 11, 2017 in San Antonio,  
17 Texas.

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VIRIDIANA CARRIZALES