Supplemental Brief Exhibit D

1		
2		
3		
4		
5		
6		
7		
8	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
9	WESTERN DISTRICT OF	r washingi on
10	STATE OF WASHINGTON,	
11	Plaintiff,	SECOND DECLARATION OF ASIF CHAUDHRY
12	v.	ASII [®] CHAUDHKT
13	DONALD TRUMP, in his official capacity as President of the United States;	
14	U.S. DEPARTMENT OF HOMELAND SECURITY; JOHN F. KELLY, in his	
15	official capacity as Secretary of the Department of Homeland Security; TOM	
16	SHANNON, in his official capacity as Acting Secretary of State; and the	
17	UNITED STATES OF AMERICA,	
18	Defendants.	
19		
20	I, Asif Chaudhry, hereby declare and affirm:	
21	1. I am the Vice President for International Programs at Washington State	
22	University (WSU), Washington State's land grant institution and the second largest public	
23	research university in the Pacific Northwest. I submit this declaration to supplement and provide	
24	additional information regarding the matters in my declaration dated January 30, 2017. I have	
25	personal knowledge of the facts set forth in this declaration, and I am competent to testify about	
26	them.	

1

Case 2:17-cv-00141-JLR Document 17-4 Filed 02/01/17 Page 3 of 5

2. As noted in my prior declaration, WSU has 136 matriculated undergraduate and graduate students from the countries targeted in the Executive Order entitled "Protecting the Nation from Foreign Terrorist Entry Into the United States." Many of these graduate students also hold paid appointments as teaching or research assistants at WSU. Because of the Executive Order, all of these individuals are constrained from traveling abroad for personal or academic research-related reasons.

3. One graduate student, who holds a paid, grant-funded research assistantship with WSU, works on a team that conducts atmospheric research, which is dependent on field experiments and collaborations world-wide. She was scheduled to participate in experiments and equipment maintenance in Greenland, which is a standard expectation of research assistants in this laboratory, but is now unable to do so. This individual also was planning to attend a summer institute in Canada and now likely will be unable to do so. These types of activities are not only directly related to her development as a scientist but are also critical to the research program as a whole. The negative impact of the Executive Order on this individual and the research program is significant.

4. Other WSU research assistants from targeted countries have had to forego job interviews in Canada for fear of being unable to return and have canceled plans to attend major conferences outside the U.S., one of which is scheduled for February 5, 2017. By preventing these individuals from participating in these activities, the Executive Order is having a significant negative impact on their career opportunities.

5. There also are nine (9) active faculty members at WSU from the countries targeted in the Executive Order. These individuals include instructors and researchers. Areas of research conducted by these individuals include research on teaching in STEM, sustainable design, using large-scale data sets for social science and educational research, molecular genetics of plant disease, thermal and fluid systems, transportation systems and traffic safety, crop phenotyping, and plant physiology. Many of these are areas of research that are directly related

Case 2:17-cv-00141-JLR Document 17-4 Filed 02/01/17 Page 4 of 5

to WSU's primary mission as the state's land grant institution. Because of the Executive Order, all of these individuals are constrained from traveling abroad for personal or academic research-related reasons.

6. WSU has at least one faculty member who is currently unable to return to WSU. She is a research associate from an affected country who is paid from a National Science Foundation Project. She traveled to Germany in January to defend her Ph.D. at another university and was scheduled to return to WSU on February 11, 2017, to continue her scientific research and faculty position. The Executive Order will prevent her from being able to do so, and the research on this project has been put on hold until she can return.

7. In addition to students and faculty, WSU has two (2) visiting scholars from the targeted countries who currently are unable to come to WSU. As clarification, the individual mentioned in my prior declaration who was turned away in Amsterdam due to the Executive Order was a student at another university but was coming to WSU as a visiting scholar to do collaborative research. WSU's typical practice is to appoint visiting scholars as adjunct faculty. The other visiting scholar has been in the visa application process and now has been informed he likely will be unable to obtain a visa.

8. As noted in my prior declaration, global engagement is a critical component of WSU's mission, which is "To apply knowledge through local and global engagement that will improve quality of life and enhance the economy of the state, nation, and world." In addition to the impact of the Executive Order on individual lives of WSU students and employees, the cumulative effect of these restrictions will be to negatively impact WSU's ability to fulfill its mission as the state's land grant university.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and complete to the best of my knowledge.

1

3

Dated this 1st day of February, 2017. Isycuandly Asif Chaudhry, Ph.D.