

1 ROBERT W. FERGUSON
 WSBA #26004
 2 Attorney General
 NOAH G. PURCELL
 3 WSBA #43492
 4 Solicitor General
 COLLEEN M. MELODY
 5 WSBA #42275
 Civil Rights Unit Chief
 6 Office of the Attorney General
 7 800 Fifth Avenue, Suite 2000
 Seattle, WA 98104
 8 206-464-7744

9 **UNITED STATES DISTRICT COURT**
 10 **WESTERN DISTRICT OF WASHINGTON**

11 STATE OF WASHINGTON,
 12
 Plaintiff,

13 v.

14 DONALD TRUMP, in his official
 capacity as President of the United
 States; U.S. DEPARTMENT OF
 15 HOMELAND SECURITY; JOHN F.
 KELLY, in his official capacity as
 16 Secretary of the Department of
 Homeland Security; TOM
 17 SHANNON, in his official capacity
 as Acting Secretary of State; and the
 18 UNITED STATES OF AMERICA,
 19 Defendants.

CIVIL ACTION NO.

DECLARATION OF NOAH G.
 PURCELL IN SUPPORT OF MOTION
 FOR TEMPORARY RESTRAINING
 ORDER

20 Pursuant to 28 U.S.C. § 1746(2), I, Noah G. Purcell, hereby declare as follows:

- 21 1. I am over the age of eighteen and competent to testify.
 22 2. I am the Solicitor General for the State of Washington. I make this declaration as a
 23 representative of the State of Washington (“State”) in support of the Motion for
 24 Temporary Restraining Order filed concurrently herewith.
 25
 26

1 3. Pursuant to Western District of Washington Local Rule 65(b)(1), on January 30, 2017, I
2 caused an attorney on my staff to call the offices of the United States Attorney for the
3 Western District of Washington to provide notice of the State’s intent to file a Motion
4 for Temporary Restraining Order later that afternoon, and to note it for hearing on
5 January 30, 2017, the same day.

6 4. Counsel for the State spoke with Kerry Keef, Civil Chief, United States Attorney’s
7 Office, Western District of Washington, 700 Stewart Street, Suite 5220, Seattle,
8 Washington 98101, (206) 553-7970.

9 5. Ms. Keef advised that Defendants will be represented by attorneys within the Federal
10 Programs Division of the United States Department of Justice in Washington, D.C.

11 6. No one from the Federal Programs Division has contacted counsel for the State.

12 7. A member of my staff queried and downloaded publicly available data from the U.S.
13 Census website regarding the number of non-citizen immigrants from Iran, Iraq, Libya,
14 Somalia, Sudan, Syria, and Yemen (the seven (7) countries listed in the President’s
15 Executive Order on immigration) residing in the State of Washington. Attached hereto
16 as **Purcell Declaration Exhibit A** is a table prepared by my staff member reflecting
17 that data.

18 8. Attached hereto as **Purcell Declaration Exhibit B** is a true and correct copy of an
19 online printout of a news article from NPR dated January 27, 2017 titled “Trump’s
20 Immigration Freeze Omits Those Linked To Deadly Attacks in U.S.”

21 9. Attached hereto as **Purcell Declaration Exhibit C** is a true and correct copy of an
22 online printout of a news article dated December 9, 2015 titled “Trump spokeswoman:
23 ‘So What? They’re Muslim.’”

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

25
26 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

///
///

Executed this 30th day of January, 2017.

s/ Noah G. Purcell
Noah G. Purcell, WSBA #43492
Solicitor General
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744