

Exhibit D

Declaration of Dr. Ahmed Shalabi

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ARAB AMERICAN CIVIL
RIGHTS LEAGUE, et al.

Plaintiffs,

v.

DONALD TRUMP, et al.

Case No.: 17-cv-10310
Hon.: Victoria A. Roberts
Mag.: Stephanie D. Davis

Defendants.

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DECLARATION OF AHMED SHALABI, MD

I, Ahmed Shalabi, MD, being duly sworn, depose and state as follows:

1. I have personal knowledge of all of the information set forth in this declaration and I am willing to testify to same under oath in court if called upon to do so.
2. I am a lawful permanent resident of the United States, and have applied to become a United States citizen. I have lived continuously in the United States for the last 22 years.
3. I am currently a citizen of Sudan. Sudan is one of the countries affected by the president's Executive Order, issued on January 27, 2017.
4. I am a Muslim.
5. I am a member of the Arab-American Civil Rights League.

6. I initially arrived to the U.S. in March 1995 on a student visa. Around 1998, I successfully applied for and received Temporary Protected Status (TPS) due to an ongoing armed conflict in Sudan.
7. Around May 2007, I became a lawful permanent resident.
8. I am a surgeon based in Owosso, MI, which is a medically underserved area. Because the area where I work does not have enough surgeons, if I am not able to continue in my position or if am stuck outside the country unable to return, there may be people who need surgery who do not get it in a timely fashion.
9. I specialize in Colon and Rectal Surgery. I received my Medical degree from the University of Debrecen. I have had surgery residencies at Johns Hopkins University, University of Maryland, at St. Raphael Hospital/Yale-New Haven Hospital, and St. Vincent Health Center. The honors I have received include being named resident of the year in 2002 at John Hopkins University.
10. I was in Canada on January 27, 2017, when I learned of President Trump's Executive Order banning individuals from seven countries. I had driven to Toronto, Canada for the weekend to visit with friends.
11. Because I hold a Sudanese passport, I was fearful that I would not be readmitted into the United States.

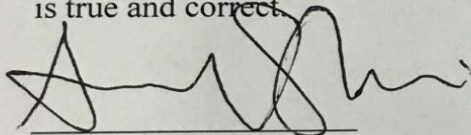
12. When the Executive Order was issued, government officials were saying that it applied to lawful permanent residents.
13. I contacted my secretary to advise her that I might need to cancel the surgeries I had scheduled for the following week.
14. I also reached out for legal assistance and was able to connect with Susan Reed, managing attorney at the Michigan Immigrant Rights Center.
15. Over the weekend after the Executive Order was issued, Ms. Reed helped me to figure out whether and how I could reenter the United States. The news reports kept changing, and it was very unclear whether lawful permanent residents would be admitted, or whether they would be admitted only on a case-by-case basis.
16. Ms. Reed helped me to compile documents related to my time in the United States, my U.S. citizen mother, and my medical career. Ms. Reed informed me that we would likely have to argue for my admission and that these documents would be necessary to convince the Customs and Border Protection officers to allow me to return to my home and practice.
17. On Sunday, January 29, 2017, I presented myself at the border crossing at the Windsor Tunnel with Ms. Reed present as my attorney. I was sent to secondary inspection where I was separated from Ms. Reed by officers, who refused to allow her to represent me in my interview. I

- spent a total of about an hour and a half with agents in secondary inspection before they finally allowed me to enter the country.
18. Since re-entering the country, I have not travelled abroad. Prior to the Executive Order I had planned a vacation to Egypt in February, 2017, and a vacation to the United Arab Emirates in March, 2017. In order to ensure surgical coverage at my hospital, I have to request time off in advance for these two trips. Unfortunately, I was forced to cancel these plans (without being able to reschedule my time off) because it was unclear whether the Executive Order would again be applied to lawful permanent residents.
 19. My inability to travel abroad is severely limiting. I live near the U.S.-Canada border. I frequently travel to Canada to meet with friends and also go occasionally for professional meetings and conferences. I travel to Canada about once a month, and sometimes travel multiple times a month.
 20. If the injunction barring application of the Executive Order to lawful permanent residents remains in effect, I will be able to travel to Canada knowing that I will be allowed back in the country. However, if the injunction is dissolved, I will be very reluctant to travel abroad based on

the fear that the government will again change its interpretation of the Executive Order and I will be prohibited from reentering.

21. I understand that the federal government now claims that the Executive Order does not apply to lawful permanent residents. However, given how much confusion there has been about the Executive Order and how many different positions the government has taken so far, I am concerned that the government may again change its position and leave me stranded abroad if I were to engage in international travel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



Ahmed Shalabi, MD

Executed on: February 20, 2017