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(See Next Page For Additional Counsel)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAI‘I**

STATE OF HAWAI‘I and ISMAIL ELSHIKH,  
Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; JOHN F. KELLY, in his official  
capacity as Secretary of Homeland Security;  
U.S. DEPARTMENT OF STATE; REX  
TILLERSON, in his official capacity as  
Secretary of State; and the UNITED STATES  
OF AMERICA,

Defendants.

Civil Action No. 1:17-cv-00050-  
DKW-KSC

**SUPPLEMENTAL**  
**DECLARATION OF NEAL K.**  
**KATYAL IN SUPPORT OF**  
**PLAINTIFFS’ MOTION TO**  
**ENFORCE OR, IN THE**  
**ALTERNATIVE, TO**  
**MODIFY PRELIMINARY**  
**INJUNCTION; EXHIBITS G,**  
**H, & I IN SUPPORT OF**  
**PLAINTIFFS’ MOTION TO**  
**ENFORCE OR, IN THE**  
**ALTERNATIVE, TO**  
**MODIFY PRELIMINARY**  
**INJUNCTION;**  
**CERTIFICATE OF**  
**SERVICE**

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**SUPPLEMENTAL DECLARATION OF NEAL K. KATYAL IN SUPPORT  
OF PLAINTIFFS' MOTION TO ENFORCE OR, IN THE ALTERNATIVE,  
TO MODIFY PRELIMINARY INJUNCTION**

I, NEAL K. KATYAL, hereby state and declare as follows:

1. I am counsel for Plaintiffs, the State of Hawai'i and Ismail Elshikh. I have personal knowledge of and am competent to testify to the truth of the matters stated herein. This Supplemental Declaration is submitted in support of Plaintiffs' Motion to Enforce or, In the Alternative, to Clarify Preliminary Injunction and Reply, filed concurrently herewith.

2. Attached as Exhibit G is a true and correct copy of the Declaration of Erol Kekic, Executive Director of the Church World Service ("CWS") Immigration and Refugee Program, as it was provided to counsel for Plaintiffs by a third party. CWS is a humanitarian agency comprised of Protestant, Anglican, and Orthodox member communions.

3. Attached as Exhibit H is a true and correct copy of the Declaration of John Feruzi, an approximately 21-year old Congolese refugee who presently lives in the Dzaleka Refugee Camp in Malawi, as it was provided to counsel for Plaintiffs by a third party. Mr. Feruzi's declaration is signed on his behalf by his attorney, Marissa Ram, who works for the International Refugee Assistance Project.

4. Attached as Exhibit I is a true and correct copy of the Declaration of Mwenda Watata, the uncle of Mr. Feruzi, who was admitted to the United States as a refugee on July 4, 2017. The declaration is submitted in the form it was provided to counsel for Plaintiffs by a third party.

5. The foregoing declarations were provided to counsel for Plaintiffs today by third party refugee relief and legal services organizations, which have worked diligently to obtain truthful and accurate copies of the declarants' recorded declaration testimony. These efforts have involved repeated, same-day communications with Mr. Feruzi in an overseas refugee camp; unfamiliarity of the declarants with the legal process; and short timing. As a result of these logistical challenges, the declarations do not reflect the form of witnessed affidavits or include certifications under penalty of perjury. Counsel for Plaintiffs have obtained representations from the third party refugee relief and legal services organizations that the contents of the declarations are truthful, and thus provides them for the Court's consideration at this time. Plaintiffs will supplement the record with additional declaration copies containing attestations under 28 U.S.C. § 1746 as soon as possible.

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

DATED: Washington, D.C., July 12, 2017.

/s/ Neal K. Katyal  
Neal K. Katyal