

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ANGE SAMMA *et al.*, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
DEFENSE *et al.*,

Defendants.

Civil Action No. 1:20-cv-01104-ESH

DECLARATION OF SCARLET KIM

I, Scarlet Kim, declare as follows:

1. I am a Staff Attorney with the American Civil Liberties Union Foundation and counsel for Plaintiffs in the above-numbered action. I submit this declaration in support of Plaintiffs' Further Supplemental Brief in Support of Plaintiffs' Motion for Summary Judgment.

2. Attached as Exhibit 1 is a true and correct copy of a declaration by Margaret Stock in support of Plaintiffs' Motion for Leave to Proceed under Pseudonyms and to Seal Personally Identifying Information, dated April 21, 2020.

3. Attached as Exhibit 2 is a true and correct copy of a publication by the U.S. Navy with the title "Guide to Naturalization Applications Based Upon Qualifying Military Service," available at https://www.jag.navy.mil/legal_services/documents/Navy%20Immigration%20Guide.pdf [<https://perma.cc/7XSL-GR9T>].

4. Attached as Exhibit 3 is a true and correct copy of a publication by the U.S. Navy with the title "Guide to Naturalization Applications Based Upon Qualifying Military Service," dated

June 22, 2011, and available at https://www.jag.navy.mil/organization/documents/Navy_Immigration_Guide.pdf [<https://perma.cc/ZC3Z-YUSC>].

5. Attached as Exhibit 4 is a true and correct copy of a publication by the U.S. Air Force with the title “Total Force U.S. Citizenship,” dated Mar. 8, 2013, and available at <https://www.jber.jb.mil/Portals/144/Services-Resources/personnel/customer-support/Customer-service-Citizenship-and-Immigration.pdf> [<https://perma.cc/B3V7-NTTK>].

6. Attached as Exhibit 5 is a true and correct copy of an excerpt from a publication by the Eighth Army with the title “Applying for Citizenship: A Guide for Servicemembers,” available at https://8tharmy.korea.army.mil/sja/assets/doc/legal/Applying_for_Citizenship_-_A_Guide_for_Servicemembers.pdf [<https://perma.cc/F37P-BNLE>].

7. Attached as Exhibit 6 is a true and correct copy of excerpts from Army Regulation 635-8, “Separation Processing and Documents,” dated Sept. 17, 2019, and available at https://armypubs.army.mil/epubs/DR_pubs/DR_a/pdf/web/ARN9413_AR635-8_FINAL.pdf.

8. Attached as Exhibit 7 is a true and correct copy of excerpts from Bureau of Navy Personnel Instruction 1900.8E, “Certification of Release or Discharge from Active Duty (DD 214, DD 214C, DD 214WS, and DD 215),” dated Mar. 25, 2019, and available at https://www.public.navy.mil/bupers-npc/reference/instructions/BUPERSInstructions/Documents/BUPERSINST_1900.8_CH-1.pdf.

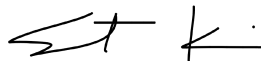
9. Attached as Exhibit 8 is a true and correct copy of excerpts from Army Regulation 623-2, “Evaluation Reporting System,” dated June 14, 2019, and available at https://armypubs.army.mil/epubs/DR_pubs/DR_a/pdf/web/ARN14342_AR623-3_FINAL.pdf.

10. Attached as Exhibit 9 is a true and correct copy of an excerpt from the Transcript of Video Conference in *Samma v. U.S. Dep't of Def.*, No. 20-cv-1104 (D.D.C.), dated July 16, 2020.

11. Attached as Exhibit 10 is a true and correct copy of an excerpt from the Transcript of Video Conference in *Samma v. U.S. Dep't of Def.*, No. 20-cv-1104 (D.D.C.), dated June 28, 2020.

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

Executed on July 23, 2020

A handwritten signature in black ink, appearing to read 'SK', is positioned above a horizontal line.

Scarlet Kim