

The Honorable Richard A. Jones

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf of
himself and other similarly situated,

Plaintiffs,

v.

JOSPEH R. BIDEN, President of the United
States, *et al.*,

Defendants.

CASE NO. 2:17-cv-00094-RAJ

**DECLARATION OF
W. MANNING EVANS
IN SUPPORT OF DEFENDANTS'
SUMMARY JUDGMENT REPLY**

I, W. Manning Evans, do declare and say:

1. I am a duly appointed Senior Litigation Counsel for the U.S. Department of Justice, Civil Division, Office of Immigration Litigation in Washington, D.C., and I am one of the attorneys assigned to represent Defendants in this action.

2. Attached hereto and marked as "Exhibit 54" is a true and correct copy of excerpts from the August 19, 2020 deposition of Marc Sageman, Ph.D, M.D.;

3. Attached hereto and marked as "Exhibit 55" is a true and correct copy of redacted excerpts from the October 8, 2020 deposition of Nadia Daud. A true and correct copy of the unredacted excerpts has been filed separately under seal;

1 4. Attached hereto and marked as “Exhibit 56” is a true and correct redacted copy of the
2 October 13, 2020 updated expert report of Bernard Siskin, Ph.D. A true and correct copy of the
3 unredacted report has been filed separately under seal;

4 5. Attached hereto and marked as “Exhibit 57” is a true and correct copy of Plaintiffs’
5 First Requests for Production to Defendants;

6 6. Attached hereto and marked as “Exhibit 58” is a true and correct copy of Defendants’
7 Third Supplemental Initial Disclosures;

8 7. Attached hereto and marked as “Exhibit 59” is a true and correct copy of an October
9 15, 2020 email sent by Plaintiffs’ counsel Sameer Ahmed to counsel for Defendants;

10 8. Attached hereto and marked as “Exhibit 60 is a true and correct copy of an October
11 15, 2020 email from Defendants’ counsel Lindsay Murphy to counsel for Plaintiffs.

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

15 Executed on this 2nd day of July 2021, at Washington, D.C.

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18 /s/ W. Manning Evans
19 W. MANNING EVANS