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1 - DECLARATION OF NAUMAN RANA
In Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and
In Opposition to Defendants' Motion for Partial Summary Judgment

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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

AYMAN LATIF, et al.,

Plaintiffs,

v.

ERIC H. HOLDER, JR., et al.,

Defendants.

Case No.: 10-cv-750 (BR)

**DECLARATION OF
NAUMAN RANA
IN SUPPORT OF PLAINTIFFS'
CROSS-MOTION FOR PARTIAL
SUMMARY JUDGMENT AND IN
OPPOSITION TO DEFENDANTS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

I, Nauman Rana, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I submit this declaration based on my personal knowledge in support of Plaintiffs' cross-motion for partial summary judgment and opposition to Defendants' motion for partial summary judgment in the above-captioned case.

2. I am the brother of Mashaal Rana, a plaintiff in the above-captioned case. I live with my parents and brothers in New York.

3. My sister moved to Pakistan to study in 2009. Although she tried to fly home to New York in February 2010, she was denied boarding on her flight from Lahore.

4. A few days after my sister was denied boarding, an FBI agent came to my family's home. He questioned me about my sister. He asked me about her religious beliefs and what she was doing in Pakistan.

5. In October 2012, my sister was six months pregnant and sought to return to New York to access medical care, deliver her child, and be with her family. She contacted me to help her find out if there was a way for her to fly home.

6. I spoke to an attorney at the American Civil Liberties Union. She told me that the U.S. government permitted the plaintiffs in this case who had been denied boarding while abroad to arrange air travel back to the United States.

7. I contacted the FBI agent who had questioned me about my sister in 2010. I asked if the FBI would clear my sister to fly home.

8. The FBI agent eventually told me that my sister was cleared to fly from Lahore to New York via London on November 3, 2012.

9. On the morning of November 3, 2012, approximately five hours before my sister's flight, the FBI agent called me. He informed me that my sister would be denied boarding on her flight from London to New York. I immediately called my sister to tell her.

10. I have no idea why the U.S. government has put my sister on the No Fly List. She does not pose a threat to civil aviation or national security.

11. I declare and state under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on March 21, 2013



NAUMAN RANA