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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO

21 CRISTA RAMOS, *et al.*,
22 Plaintiffs,

23 vs.

24 KIRSTJEN NIELSEN, *et al.*,
25 Defendants.

Case No. 3:18-cv-1554-EMC

**DECLARATION OF HIWAIDA ELARABI
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Date: September 25, 2018
Time: 10:30 a.m.
Judge: Hon. Edward M. Chen
Dept.: Courtroom 5, 17th Floor

Complaint Filed: March 12, 2018
Trial Date: None set

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** Institution listed for identification purposes only*

DECLARATION OF HIWAIDA ELARABI

1
2 1. I have personal knowledge of the facts stated in this declaration. If sworn as a
3 witness, I could and would testify to these facts.

4 2. I have had Temporary Protected Status (TPS) since 1997. In September 2017, the
5 U.S. government announced that TPS for Sudan would be terminated on November 2, 2018.

6 3. I am submitting this declaration to describe the harms that I have experienced since
7 the announcement of the termination of TPS for Sudan, and the harm I will suffer if TPS is
8 terminated for Sudan.

9 **Background**

10 4. I am from Sudan and am 55 years old.

11 5. Since I arrived in the United States, I have lived in Newton, Massachusetts with my
12 aunt and her family, all of whom are U.S. citizens.

13 6. I have a Bachelors degree in Biochemistry from Alexandria University in Egypt.
14 Before I traveled to the United States, I taught biology at the high school level and zoology at the
15 university level. While living in the United States, I completed a Masters degree in bioinformatics at
16 Brandeis University.

17 7. Since 2014, I have worked at Western Government University, first as a Biochemistry
18 Evaluator and later as the E-Care Coordinator. Prior to this, from 1998 until 2015 (overlapping with
19 the beginning of my work at Western Government University), I worked as a Health Educator with
20 the Massachusetts Department of Public Health.

21 **Impact of Decision to Terminate TPS**

22 8. It has been difficult for me, financially and emotionally, since the U.S. government
23 announced the termination of TPS for Sudan.

24 9. Even though I have legal status until November, I am already much more nervous
25 than I was before the announcement that TPS for Sudan would be terminated. I find myself looking
26 over my shoulder and imagining worst-case scenarios. I am depressed and hopeless much of the
27 time. All I can think about is my immigration status. My state of mind has affected my interactions
28 with people. I worry more in my social interactions; I am nervous about how I am responding to

1 people given my anxiety about the situation. The recent decision has made me feel unwelcome in a
2 country, and a community, which has been my home for more than twenty years—which is indeed
3 my home.

4 10. I had always dreamed of owning a restaurant. In 2015, I decided to work towards this
5 dream by purchasing and rehabilitating a small restaurant close to where I live. I did so based on the
6 belief that my life in the United States was relatively stable, after 18 years living here with legal
7 status at the time. I took out substantial loans to purchase an existing restaurant. When the U.S.
8 government announced the termination of TPS in 2017, I was shocked and felt obligated to sell the
9 business quickly even though it had started off well. I simply did not know what the future would
10 hold, or how long it would take to sell the business. I lost significant income, and took on substantial
11 debt, from purchasing and selling the business so quickly. It was also a heartbreaking decision.

12 11. I am afraid to return to Sudan and the decision to end TPS has had a significant
13 psychological impact on me. If forced to leave the United States, my hope of a secure future would
14 disappear. I would lose much of the money I have saved during the more than twenty years I have
15 lived here. I have already lost some of my savings in sunk operational costs of a business that I
16 bought and then sold quickly following the termination of TPS. I would also likely lose some of my
17 retirement savings because of an early withdrawal. I have also had to expend substantial resources to
18 seek legal advice about legal options for staying in the United States or preparing for removal
19 proceedings.

20 12. If TPS for Sudan is terminated, I do not believe I have any real options. I have not
21 returned to Sudan since I left and do not believe that I could safely do so. Yet, I cannot imagine
22 living or working in the United States without authorization.

23 13. My employer knows that I have a temporary employment authorization that is due to
24 expire. Every time my employment authorization has approached its expiration, my employer has
25 asked me for a copy of the new card. I know that my employer will soon ask me if I continue to be
26 authorized to work in the United States. If TPS is terminated, I will not be able to continue in my
27 work.

