

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYO-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

**MOTION FOR LEAVE TO INTERVENE**

Proposed Defendant-Intervenors Karla Perez, Maria Rocha, Jose, Magaña-Salgado, Nanci J. Palacios Godinez, Elly Marisol Estrada, Karina Ruiz De Diaz, Carlos Aguilar Gonzalez, Karla Lopez, Luis A. Rafael, Darwin Velasquez, Jin Park, Oscar Alvarez, Nancy Adossi, Denise Romero, Pratihtha Khanna, Jung Woo Kim, Angel Silva, Moses Kamau Chege, Hyo-Won Jeon, Elizabeth Diaz, Maria Diaz, and Blanca Gonzalez (collectively, “Proposed Defendant-

Intervenors”), respectfully request that the Court grant them leave to intervene as defendants in this action as of right pursuant to Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, grant them permissive intervention pursuant to Federal Rule of Civil Procedure 24(b)(1)(B).

In support of this Motion, Proposed Defendant-Intervenors rely on and incorporate herein their Memorandum of Law in Support, filed with the Court today, and its accompanying appendices and exhibits, and Proposed Defendant-Intervenors’ Answer to the Complaint, attached as Exhibit 1 to this Motion, to comply with Federal Rule of Civil Procedure 24(c).

Dated: May 8, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

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**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that on May 7, 2018, I conferred with Plaintiffs and Defendants regarding this motion. Plaintiffs advised that they do not oppose the motion to intervene. Defendants did not provide a position but responded to the request to confer on May 7, 2018, as follows: “Defendants will review your motion to intervene, and respond as appropriate.”

/s/ Nina Perales  
Nina Perales

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on the eighth day of May, 2018, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales  
Nina Perales



## TABLE OF CONTENTS

	Page
I. STATEMENT OF THE ISSUES TO BE RULED UPON BY THE COURT.....	1
II. STATEMENT OF THE NATURE AND STAGE OF THE PROCEEDING.....	2
III. SUMMARY OF THE ARGUMENT .....	7
IV. THE PROPOSED DEFENDANT-INTERVENORS ARE ENTITLED TO INTERVENTION AS OF RIGHT .....	8
A. The Proposed Defendant-Intervenors’ Motion to Intervene Is Timely .....	8
B. The Proposed Defendant-Intervenors Possess a Protectable Interest .....	11
C. The Proposed Defendant-Intervenors’ Interests Would Be Subject to Impairment If Intervention Were Denied .....	13
D. The Proposed Defendant-Intervenors’ Interests Cannot Be Adequately Represented by the Existing Parties .....	14
V. PERMISSIVE INTERVENTION IS ALSO APPROPRIATE.....	18
VI. CONCLUSION .....	19

## TABLE OF AUTHORITIES

	Page(s)
<b><u>CASES</u></b>	
<i>Arpaio v. Obama</i> , No. 14-cv-1966, slip op. at 5 (D.D.C. Dec. 23, 2014) .....	3
<i>Black Fire Fighters Ass’n of Dallas v. City of Dallas</i> , 19 F.3d 992 (5th Cir. 1994) .....	12, 14
<i>Ceres Gulf v. Cooper</i> , 957 F.2d 1199 (5th Cir. 1992) .....	9, 14
<i>Chiles v. Thornburgh</i> , 865 F.2d 1197 (11th Cir. 1989) .....	12, 14
<i>Day v. Sebelius</i> , 227 F.R.D. 668 (D. Kan. 2005).....	12, 17
<i>Decker v. United States Dep’t of Labor</i> , 473 F. Supp. 770 (E.D. Wis. 1979) .....	13
<i>Diaz v. S. Drilling Corp.</i> , 427 F.2d 1118 (5th Cir. 1970) .....	11
<i>Dimond v. District of Columbia</i> , 792 F.2d 179 (D.C. Cir. 1986).....	15
<i>Edwards v. City of Houston</i> , 78 F.3d 983 (5th Cir. 1996) .....	8, 10, 15
<i>Ford v. City of Hunstville</i> , 242 F.3d 235 (5th Cir. 2001) .....	9
<i>Forest Conservation Council v. U.S. Forest Serv.</i> , 66 F.3d 1489 (9th Cir. 1995), <i>rev’d on other grounds by Wilderness Soc’y v.</i> <i>U.S. Forest Serv.</i> , 630 F.3d 1173 (9th Cir. 2011) .....	14, 15
<i>Gen. Tel. Co. of the Nw., Inc. v. EEOC</i> , 446 U.S. 318 (1980) .....	15
<i>Grutter v. Bollinger</i> , 188 F.3d 394 (6th Cir. 1999) .....	13, 14
<i>In re Lease Oil Antitrust Litig.</i> , 570 F.3d 244 (5th Cir. 2009) .....	9, 10
<i>John Doe No. 1 v. Glickman</i> , 256 F.3d 371 (5th Cir. 2001) .....	8

<i>Lewis v. Stark</i> , 312 F. Supp. 197 (N.D. Cal. 1968), <i>rev'd on other grounds by</i> <i>Lewis v. Martin</i> , 397 U.S. 552 (1980) .....	12
<i>Martin v. Travelers Indem. Co.</i> , 450 F.2d 542 (5th Cir. 1971) .....	14
<i>Mich. State AFL-CIO v. Miller</i> , 103 F.3d 1240 (6th Cir. 1997) .....	13
<i>Natural Res. Def. Council v. Costle</i> , 561 F.2d 904 (D.C. Cir. 1977).....	12
<i>Ross v. Marshall</i> , 426 F.3d 745 (5th Cir. 2005) .....	11
<i>Saldano v. Roach</i> , 363 F.3d 545 (5th Cir. 2004) .....	8
<i>Sierra Club v. Espy</i> , 18 F.3d 1202 (5th Cir. 1994) .....	8, 14
<i>Sierra Club v. Fed. Emergency Mgmt. Agency</i> , No. 07-0608, 2008 U.S. Dist. LEXIS 47405 (S.D. Tex. June 11, 2008).....	15
<i>Stallworth v. Monsanto Co.</i> , 558 F.2d 257 (5th Cir. 1977) .....	9, 10
<i>Trbovich v. United Mine Workers of Am.</i> , 404 U.S. 528 (1972) .....	14
<i>United States v. LULAC</i> , 793 F.2d 636 (5th Cir. 1986) .....	18
<i>Usery v. Brandel</i> , 87 F.R.D. 670 (W.D. Mich. 1980).....	13

## **STATUTES**

DHS Appropriations Act, Pub. L. No. 111-83, 123 Stat 2142, 2149 (2009) .....	3
--	---

**TABLE OF AUTHORITIES (continued)**

	<b>Page(s)</b>
<b><u>RULES</u></b>	
Fed. R. Civ. P. 24 advisory comm. note to 1966 Amendment .....	13
Fed. R. Civ. P. 24(a)(2) .....	<i>passim</i>
Fed. R. Civ. P. 24(b) .....	18
Fed. R. Civ. P. 24(b)(1)(B) .....	1, 18



The Proposed Defendant-Intervenors respectfully request that the Court grant them leave to intervene as defendants in this action as of right pursuant to Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, grant them permissive intervention pursuant to Federal Rule of Civil Procedure 24(b)(1)(B).

Plaintiffs have advised the Proposed Defendant-Intervenors that they do not oppose the motion to intervene. Defendants have responded that they will review the intervention request after it is filed and respond as appropriate.

**I. STATEMENT OF THE ISSUES TO BE RULED UPON BY THE COURT**

The Proposed Defendant-Intervenors Karla Perez, Maria Rocha, Jose, Magaña-Salgado, Nanci J. Palacios Godinez, Elly Marisol Estrada, Karina Ruiz De Diaz, Carlos Aguilar Gonzalez, Karla Lopez, Luis A. Rafael, Darwin Velasquez, Jin Park, Oscar Alvarez, Nancy Adossi, Denise Romero, Pratishta Khanna, Jung Woo Kim, Angel Silva, Moses Kamau Chege, Hyo-Won Jeon, Elizabeth Diaz, Maria Diaz, and Blanca Gonzalez (the “Proposed Defendant-Intervenors”) are recipients of deferred action pursuant to the Deferred Action for Childhood Arrivals (DACA) initiative<sup>1</sup> and are directly affected by the resolution of the claims in this case. All Proposed Defendant-Intervenors have authorized presence in the United States, are authorized to work, and are eligible for renewal of their grants of deferred action. If DACA is enjoined, the Proposed Defendant-Intervenors as well as hundreds of thousands of others similarly situated will lose their ability to live in the U.S. and could face deportation and

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<sup>1</sup> In the June 15, 2012 Memorandum issued by Secretary of the Department of Homeland Security Janet Napolitano entitled “Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children,” the Secretary established guidelines from the Department of Homeland Security (“DHS”) for the application of prosecutorial discretion with regard to deferred action for low-priority young individuals brought to the United States as Children. Dkt. No. 1, Ex. 1.

separation from their families and their communities. Moreover, they will lose their work authorization which accompanies a grant of deferred action, thereby limiting their access to employment opportunities and directly affecting their ability to support themselves and their families and to contribute to the U.S. economy. This unique, personal interest supports their intervention. Accordingly, the Proposed Defendant-Intervenors hereby respectfully submit the following Memorandum of Law in Support of Motion to Intervene as Defendants.

## **II. STATEMENT OF THE NATURE AND STAGE OF THE PROCEEDING**

Plaintiffs filed this lawsuit in order to halt the enforcement of the June 15, 2012 memorandum by the Secretary of the U.S. Department of Homeland Security titled “Exercising Prosecutorial Discretion with Respect to Individuals Who Came to the United States as Children.” (DACA Memo). Dkt. No. 1, Ex. 1. The DACA Memo provides guidelines for the application of prosecutorial discretion with regard to specific categories of low-priority young immigrants who were brought to the U.S. as children. Deferred action is a type of prosecutorial discretion under which DHS does not seek, for a limited period of time, to remove an individual who is present in the U.S. without authorization. *Id.* Deferred action under DACA “confers no substantive right, immigration status or pathway to citizenship.” *Id.* DACA provides eligible individuals with the opportunity to apply for work authorization and to live without fear of being unexpectedly separated from their jobs, family members and communities. *Id.*

The DACA memo recognizes that “[a]s a general matter, these individuals lacked the intent to violate the law and our ongoing review of pending removal cases is already offering administrative closure to many of them.” *Id.* The memo seeks “to ensure that our enforcement resources are not expended on these low priority cases but are instead appropriately focused on people who meet our enforcement priorities.” *Id.* In 2014, DHS estimated that there are approximately 11.3 million undocumented immigrants eligible for removal, but the agency only

has the resources to remove fewer than 400,000 each year. *See Arpaio v. Obama*, 27 F.Supp.3d 185, 192-193 (D.D.C. Dec. 23, 2014).

In light of these limited resources, DACA is a consequence of Congress's directive to DHS to prioritize "the identification and removal of [immigrants] ... by the severity of the crime." DHS Appropriations Act, Pub. L. No. 111-83, 123 Stat 214, 2149 (2009). Eligibility for deferred action under DACA reflects that qualifying individuals are a low priority for enforcement.

For an individual to be considered for an exercise of prosecutorial discretion pursuant to the DACA memo, she (1) must have come to the United States under the age of sixteen; (2) must have continuously resided in the United States since before June 12, 2007, and been present in the U.S. on June 12, 2012; (3) must be in school, have graduated from high school, have obtained a general education development certificate or be an honorably discharged veteran of the Coast Guard or Armed Forces of the United States; (4) must not have been convicted of a felony offense, a significant misdemeanor offense, multiple misdemeanor offenses, or otherwise pose a threat to national security or public safety; and (5) must not be above the age of thirty. Dkt. No. 1, Ex. 1.

The Proposed Defendant-Intervenors satisfied the DACA guidelines and DHS exercised prosecutorial discretion favorably to grant each of them deferred action and work authorization. If DACA is enjoined, the Proposed Defendant-Intervenors will become subject to arrest, detention, and removal proceedings as soon as their current grants of deferred action expire. They also will lose their work authorization and ability to be employed. Despite their low priority as candidates for deportation given DHS's limited resources and prioritization mandates, their lives will be upended. Families could be split apart, including those with elderly parents

requiring care and families with siblings or children who are U.S. citizens who are cared for by these Proposed Defendant-Intervenors. Community relationships could be undone, education terminated, and work opportunities foreclosed.

The summary of declarations, attached to this Memorandum as Appendix A Tab One, provides a more complete description of Proposed Defendant Intervenors' connections to the United States and experiences with deferred action. The following paragraphs are a sample of those experiences.

Karla Perez lives in Houston, Texas, and is a DACA recipient. (Declaration of Karla Perez, Appendix A, Tab 2, ¶¶ 1, 8). She was born in Mexico and came with her parents to the United States when she was two years old. (*Id.* ¶ 2) Ms. Perez graduated from Pasadena Memorial High School in Pasadena, Texas, where she was a member of the National Honor Society and captain of the varsity soccer team. (*Id.* ¶ 3) Ms. Perez graduated magna cum laude from the University of Houston, where she received a Bachelor's degree in Business Administration. (*Id.* ¶ 4) Ms. Perez is 25 years old and a third-year law student at the University of Houston Law Center. (*Id.* ¶ 5) As a law student, Ms. Perez has assisted attorneys at several non-profit organizations to provide legal services to crime victims, DACA recipients, and immigrants who have survived gender-based violence. (*Id.* ¶ 6) She is a board member of United We Dream, the largest immigrant youth-led network in the United States. (*Id.* ¶ 7) Ms. Perez has served as the statewide coordinator of United We Dream legislative campaigns advocating for improved living conditions for immigrants in Texas. (*Id.*) Ms. Perez earned the Texas Center for Public Policy Priorities' 2015 Future of Texas Award, and the Dallas Morning News named her a 2015 Texan of the Year Finalist. (*Id.*)

Jin Park lives in Cambridge, Massachusetts, and is a DACA recipient. (Declaration of Jin

Park, Appendix A, Tab 12, ¶¶ 1, 14). He was born in South Korea and was brought by his parents to the United States when he was seven years old. (*Id.* ¶ 2) Mr. Park is now 22 years old and an undergraduate student at Harvard College studying molecular and cellular biology with a minor in government and plans to apply to medical school after he graduates from college. (*Id.* ¶ 3, 4) He is currently employed at a university cancer research institute in Cambridge, Massachusetts. (*Id.* ¶ 5) Mr. Park previously worked at the New York City Mayor’s Office, where he helped implement a care coordination program for undocumented immigrants in the City. (*Id.* ¶ 6) He served as the director of naturalization assistance programs at Harvard, which provides services to low-income immigrants, primarily from Boston’s Chinatown. (*Id.* ¶ 7) Mr. Park incorporated his own 501(c)(3) organization (“HigherDreams, Inc.”), which provides training and direct services to undocumented high school students in Boston. (*Id.* ¶ 8) HigherDreams has recently partnered with Boston Public Schools to provide trainings to guidance counselors in the district regarding the unique challenges that undocumented students face. (*Id.* ¶ 9) For his work with HigherDreams, the White House selected Mr. Park as a “Champion of Change” for college opportunity in November 2016. (*Id.* ¶ 10) He was also named a White House Asian-American and Pacific Islander Initiative Spokesperson during President Obama’s tenure. (*Id.* ¶ 11) At Harvard, Mr. Park is the recipient of the Harvard Presidential Public Service fellowship and was named a John Harvard Scholar. (*Id.* ¶ 12) Mr. Park was also selected as the 2018 Harvard Orator, one of two student speakers to address the Class of 2018 on Class Day. (*Id.* ¶ 13)

Dr. Nancy Adossi lives in Houston, Texas and is a DACA recipient. (Declaration of Nancy Adossi, Appendix A, Tab 14, ¶¶ 1, 9). She was born in Lomé, Togo and was brought to the United States by her parents when she was 9 years old. (*Id.* ¶ 2) Dr. Adossi graduated from

the magnet program at George W. Carver High School in the top 10% of her class. (*Id.* ¶ 3) She received a bachelor's degree in Political Science and International Relations from the University of Houston, where she graduated as the valedictorian and was keynote speaker for her class. (*Id.* ¶ 4) Dr. Adossi earned a master's degree in Public Administration from the University of Houston, which awarded her the 2013 Master's in Public Administration Alumni Award. (*Id.* ¶ 5) She also holds a Doctorate of Education in Health Sciences Technology from the University of Houston. (*Id.* ¶ 6) She was the youngest graduate of that program. (*Id.*) Dr. Adossi is 28 years old and currently works as a 6<sup>th</sup> grade teacher in the social studies program at Paul Revere Middle School. (*Id.* ¶ 7) She also works as a research consultant with Lift a Village and the UndocuBlack Network and has previously worked as a research consultant with the Black Alliance for Just Immigration. (*Id.* ¶ 8)

Karina Ruiz De Diaz lives in Phoenix, Arizona, and is a DACA recipient. (Declaration of Karina Ruiz De Diaz, Appendix A, Tab 7, ¶¶ 1, 9). Mrs. Ruiz De Diaz was born in Mexico City and came with her parents to the United States when she was 15 years old. (*Id.* ¶ 2) Mrs. Ruiz De Diaz graduated from Sunnyslope High School in Phoenix. (*Id.* ¶ 3) In high school, Mrs. Ruiz De Diaz was a member of the National Honor Society, the Spanish Honor Society, and the Air Force JROTC. (*Id.*) Mrs. Ruiz De Diaz earned a scholarship from the Sunburst Foundation to attend college. (*Id.* ¶ 4) She attended Arizona State University, from which she earned a Bachelor of Science in Biochemistry in 2015. (*Id.*) Mrs. Ruiz De Diaz is currently 33 years old and works as the Executive Director of the Arizona Dream Act Coalition, an immigrant youth-led organization focused on higher education and immigrant rights. (*Id.* ¶ 5) Mrs. Ruiz De Diaz is a licensed real estate agent and the mother of three United States citizen children. (*Id.* ¶¶ 6, 7) She is an active member of her church, a parent volunteer and President of the Mountain View

Elementary School Parent Teacher Organization (PTO), where two of her children attend school, and a volunteer at HonorHealth John C. Lincoln Medical Center. (*Id.* ¶ 8) She is also a volunteer at One Arizona Table, an organization that promotes civic engagement among Latino and immigrant communities. (*Id.*)

### **III. SUMMARY OF THE ARGUMENT**

As set forth below, Plaintiffs’ requested injunctive relief, if granted, would substantially impair the interests of the Proposed Defendant-Intervenors, who are recipients of grants of deferred action pursuant to DACA. Defendants’ attorneys cannot adequately represent the Proposed Defendant-Intervenors’ interests because they are bound to the position of the U.S. Attorney General that DACA is “an unconstitutional exercise of authority by the Executive Branch”<sup>2</sup> and “vulnerable to the same legal and constitutional challenges that the courts recognized with respect to the DAPA program.”<sup>3</sup>

Defendants’ attorneys also cannot adequately represent the Proposed Defendant-Intervenors’ interests because they are responsible for representing a broad range of public interests and are not subject to the consequences of the implementation of the DACA memo or the consequences of enjoining the implementation of the DACA memo. Allowing the Proposed Defendant-Intervenors to participate as intervenors will ensure that their direct, immediate interests are adequately protected and will provide them with the opportunity to offer evidence and argument that will assist the Court in rendering a decision in this important case. Because the Proposed Defendant-Intervenors meet all the requirements for intervention under Rule 24(a)(2), they respectfully request that their motion to intervene be granted.

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<sup>2</sup> United States Department of Justice, *Attorney General Sessions Delivers Remarks on DACA*, (September 5, 2017), <https://www.justice.gov/opa/speech/attorney-general-sessions-delivers-remarks-daca> (last visited May 7, 2018).

<sup>3</sup> *Id.*

**IV. THE PROPOSED DEFENDANT-INTERVENORS ARE ENTITLED TO INTERVENTION AS OF RIGHT**

Federal Rule of Civil Procedure 24(a)(2) provides:

On timely motion, the court must permit anyone to intervene who . . . claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest, unless existing parties adequately represent that interest.

To intervene as of right under Rule 24(a)(2), an applicant must meet four requirements:

(1) the motion to intervene is timely; (2) the potential intervenor asserts an interest that is related to the basis of the controversy in the underlying case; (3) the disposition of the case may impair or impede the potential intervenor's ability to protect his interest; and (4) the existing parties do not adequately represent the potential intervenor's interests. *See Saldano v. Roach*, 363 F.3d 545, 551 (5th Cir. 2004).

The Fifth Circuit has construed Rule 24(a) broadly in favor of intervenors. *See id.* at 999 (internal quotation and citation omitted); *Texas v. United States*, 805 F.3d 653, 657 (5th Cir. 2015) ("Federal courts should allow intervention where no one would be hurt and the greater justice could be attained" (citing *Sierra Club v. Espy*, 18 F.3d 1202, 1205 (5th Cir. 1994)) (internal quotation marks omitted)); *See also John Doe No. 1 v. Glickman*, 256 F.3d 371, 375 (5th Cir. 2001) ("[T]he inquiry under subsection (a)(2) is a flexible one, which focuses on the particular facts and circumstances surrounding each application"); *Edwards v. City of Houston*, 78 F.3d 983, 999 (5th Cir. 1996) ("[I]ntervention of right must be measured by a practical rather than technical yardstick") (internal quotation and citation omitted)).

**A. The Proposed Defendant-Intervenors' Motion to Intervene Is Timely**

In determining whether a motion for intervention is timely under Fed. R. Civ. P. 24(a)(2), the Court should consider: (1) the length of time between the potential intervenor's



learning that its interest is no longer protected by the existing parties and its filing of a motion to intervene, (2) the extent of prejudice to the existing parties from allowing late intervention, (3) the extent of prejudice to the potential intervenor if the motion is denied, and (4) any unusual circumstances. *See Stallworth v. Monsanto Co.*, 558 F.2d 257, 264-66 (5th Cir. 1977); *In re Lease Oil Antitrust Litig.*, 570 F.3d 244, 247-48 (5th Cir. 2009).

The Proposed Defendant-Intervenors' Motion to Intervene comes promptly after they learned of their interest in the case via the filing of Plaintiffs' Complaint on May 1, 2018. The litigation is currently in its earliest stages, and the timing of this motion poses no prospect of prejudicing the parties. At this early juncture, Defendants have yet to file their answer, no motions have been heard, no discovery has been conducted, no scheduling order has been issued, and no trial date set.

Although Plaintiffs have filed a motion for a preliminary injunction (*see* Dkt. No. 5), the Court has not ruled on this motion. The Proposed Defendant-Intervenors do not intend to request any modification to the current briefing schedule for the motion for a preliminary injunction, and intervention therefore poses no potential to prejudice the rights of any current party. *See Ford v. City of Hunstville*, 242 F.3d 235, 240 (5th Cir. 2001) (finding that prejudice is only created by "the intervenor's delay in seeking to intervene after it learns of its interest") (citing *Ceres Gulf v. Cooper*, 957 F.2d 1199, 1203 (5th Cir. 1992)); *see also Stallworth*, 558 F.2d at 265 ("[T]he prejudice to the original parties to the litigation that is relevant to the question of timeliness is only that prejudice which would result from the would-be intervenor's failure to request intervention as soon as he knew or reasonably should have known about his interest in the action").

On the other hand, the Proposed Defendant-Intervenors would be severely prejudiced if this Court denies this motion to intervene. In *Stallworth*, the Fifth Circuit framed the question

of prejudice against proposed intervenors who are denied intervention in terms of whether “a [Rule 24] section (a) intervenor ‘may be seriously harmed if he is not permitted to intervene.’” *Stallworth*, 558 F.2d at 266 (internal quotation and citation omitted). In this case, distinct from Defendants, the Proposed Defendant-Intervenors have a direct, personal and financial stake in the outcome of this case. In point of fact, the Proposed Defendant-Intervenors are the individuals meant to be affected by the outcome of this case: if the Court enjoins DACA, the Proposed Defendant-Intervenors will lose their authorized presence and ability to be employed and will be at risk of losing their jobs, their education, their family members who reside in the U.S., and their communities.

As nonparties, the Proposed Defendant-Intervenors will be directly affected by any court-ordered remedy, but will not be able to participate in presenting evidence and argument in support of their positions or to appeal the ruling. *See Edwards*, 78 F.3d at 1002–03; *see also Lease Oil Antitrust Litig.*, 570 F.3d at 249–50 (“Intervening in the existing federal lawsuit is the most efficient, and most certain, way for [the potential intervenor] to pursue its claim”). Without the ability to intervene, the Proposed Defendant-Intervenors will be relegated to the sidelines in a case in which their interests will be directly affected by the outcome and their fate will be determined by other parties.

As the individuals directly affected by Plaintiffs’ lawsuit, the Proposed Defendant-Intervenors respectfully urge the Court to grant them an opportunity to present their case and protect their interests and the interests of other undocumented immigrants who receive deferred action pursuant to DACA. Considering each of the factors above, this intervention is timely because (1) the Proposed Defendant-Intervenors promptly filed this motion; (2) the existing parties will not be prejudiced if the Court permits intervention at this juncture; and (3) the

Proposed Defendant-Intervenors will be greatly harmed if this motion is denied because they will not be able to protect their interests before the Court.

**B. The Proposed Defendant-Intervenors Possess a Protectable Interest**

The Proposed Defendant-Intervenors also satisfy the requirements of Rule 24(a)(2) because they have a protectable interest in the subject matter of this litigation that would be otherwise impaired by an adverse decision. Their protectable interest does not have “to be of a legal nature identical to that of the claims asserted in the main action.” *Diaz v. S. Drilling Corp.*, 427 F.2d 1118, 1124 (5th Cir. 1970). “In other words, an interest is sufficient if it is of the type that the law deems worthy of protection, even if the intervenor does not have an enforceable legal entitlement or would not have standing to pursue her own claim.” *Texas*, 805 F.3d at 659. Ultimately, “the interest ‘test’ is primarily a practical guide to disposing of lawsuits by involving as many apparently concerned persons as is compatible with efficiency and due process.” *Ross v. Marshall*, 426 F.3d 745, 757 (5th Cir. 2005).

Like the prospective recipients of Deferred Action for Parents of Americans and Lawful Permanent Residents (“DAPA”) in *Texas v. U.S.* (14-cv-254), the Proposed Defendant-Intervenors “have interests sufficient to support intervention.” *Texas*, 805 F.3d at 660. First, the Proposed Defendant-Intervenors have an interest in receiving deferred action pursuant to DACA so that they may legally remain in the United States. *Id.* (“This is not a mere generalized interest in the implementation of DAPA; rather, the Jane Does are the intended beneficiaries of the challenged federal policy”).

Second, the Proposed Defendant-Intervenors “have an interest in the employment opportunities that would be available to them if they are granted deferred action and employment authorization, the former of which would make them eligible for the latter.” *Id.*

Third, some of the Proposed Defendant-Intervenors are parents and “have an interest in directing the upbringing of their United States-citizen children [which is] a legally protected liberty interest under the Due Process Clause.” *Id.*

Courts have routinely granted intervention to parties seeking to protect their interest in government programs that affect them. *See, e.g. id.* at 661:

In short, the Jane Does have a real, concrete stake in the outcome of this litigation—if DAPA is invalidated, the Jane Does will lose their opportunity to obtain deferred action and their opportunity to obtain employment authorization. The Jane Does are not individuals seeking to defend a governmental policy they support on ideological grounds; rather, they are the intended beneficiaries of the program being challenged. Just as the parents in *Brumfield* had a specific, concrete interest in their children's education, and just as the individuals in *Edwards* and *Black Fire Fighters* had a specific, concrete interest in pursuing job opportunities, the Jane Does have interests that are sufficiently concrete and specific to support their intervention by right;

*See also, e.g. Day v. Sebelius*, 227 F.R.D. 668, 670, 676 (D. Kan. 2005) (granting motion to intervene as defendants filed by the Kansas League of United Latin American Citizens, the Hispanic American Leadership Organization, and three college students); *Chiles v. Thornburgh*, 865 F.2d 1197, 1214 (11th Cir. 1989) (detainees seeking to intervene as a matter of right in an action brought by a U.S. Senator to challenge housing of immigrant felons at a particular facility had an interest relating to the main suit); *Lewis v. Stark*, 312 F. Supp. 197 (N.D. Cal. 1968), *rev'd on other grounds by Lewis v. Martin*, 397 U.S. 552 (1980) (granting intervention to families with men assuming the role of spouse in the household in challenge to state welfare law). In the same way, the Proposed Defendant-Intervenors here have shown strong and legally cognizable interests related to DACA.

The Proposed Defendant-Intervenors stand to lose economic opportunities if the Court grants Plaintiffs' request, because their work authorization will end and they would lose the ability to be employed. Without the opportunity to apply for work authorization, their ability to

support themselves and their families, including their U.S. citizen children, is extremely limited. Courts have held that economic interests, especially those that would “afford [the Proposed Defendant-Intervenors] greater recompense and satisfaction,” are a significant protectable interest. *Usery v. Brandel*, 87 F.R.D. 670, 676 (W.D. Mich. 1980); *see also Decker v. United States Dep’t of Labor*, 473 F. Supp. 770 (E.D. Wis. 1979) (holding that a city archdiocese which received financial benefits from a federal statute had a sufficient interest in the action to intervene as of right under Rule 24(a)(2)).

The Proposed Defendant-Intervenors’ interests diverge from the broader interests that Defendants pursue: Defendants are responsible for issuing and implementing DACA, but none of them are or ever will be directly affected by DACA. The outcome of this litigation does not jeopardize Defendants’ families’ well-being or their ability to earn a living, but it does jeopardize the Proposed Defendant-Intervenors, who ask the Court to provide them with the opportunity to defend their own interests under DACA.

**C. The Proposed Defendant-Intervenors’ Interests Would Be Subject to Impairment if Intervention Were Denied**

The Proposed Defendant-Intervenors are “so situated that the disposition of the action may as a practical matter impair or impede [its] ability to protect [its] interest.” Fed. R. Civ. P. 24(a)(2). Here, the advisory committee notes to Rule 24(a) are instructive: “[i]f an absentee would be substantially affected in a practical sense by the determination made in an action, he should, as a general rule, be entitled to intervene.” Fed. R. Civ. P. 24 advisory committee note to 1966 Amendment. To demonstrate “impairment,” a prospective intervenor “must show only that impairment of its substantial legal interest *is possible* if intervention is denied.” *Grutter v. Bollinger*, 188 F.3d 394, 399 (6th Cir. 1999) (citing *Mich. State AFL-CIO v. Miller*, 103 F.3d 1240, 1247 (6th Cir. 1997) (emphasis added)). “This burden is minimal.” *See Grutter*, 188 F.3d

at 399 (rejecting the notion that Rule 24(a)(2) requires a specific legal or equitable interest).

There is no doubt that the relief Plaintiffs seek in this case—terminating deferred action and work authorization under DACA for hundreds of thousands of undocumented young people— will directly impair the Proposed Defendant-Intervenors’ lives, potentially resulting in deportation, disrupting and separating family members, fracturing communities, and preventing access to employment.

The Proposed Defendant-Intervenors cannot wait until the conclusion of the litigation to vindicate their interests. Courts have recognized that parties seeking intervention would face a “practical disadvantage” in asserting their rights once a court has rendered a decision. *Chiles*, 865 F.2d at 1214. The Fifth Circuit has recognized that a prospective intervenor’s interest may be practically “impaired by the *stare decisis* effect” of a court’s rulings in subsequent proceedings. *Sierra Club*, 18 F.3d at 1207 (quoting *Ceres Gulf*, 957 F.2d at 1204) (italics in original)); *see also Martin v. Travelers Indem. Co.*, 450 F.2d 542, 554 (5th Cir. 1971) (“[S]tare decisis . . . would loom large” in any attempt by prospective intervenors “to achieve a favorable resolution of the coverage issue” on their own); *Black Fire Fighters Ass’n of Dallas v. City of Dallas*, 19 F.3d 992, 994 (5th Cir. 1994) (to the extent that a lawsuit involves common legal issues, potential adverse effects on the prospective intervenors favor intervention).

**D. The Proposed Defendant-Intervenors’ Interests Cannot Be Adequately Represented by the Existing Parties**

The burden under this prong is “satisfied if [the Proposed Defendant-Intervenors] show[] that representation of [their] interest ‘may be’ inadequate; and the burden of making that showing should be treated as minimal.” *Trbovich v. United Mine Workers of Am.*, 404 U.S. 528, 538 n.10 (1972). Courts have recognized that “[i]nadequate representation is most likely to be found when the applicant asserts a personal interest that does not belong to the general public.” *Forest*

*Conservation Council v. U.S. Forest Serv.*, 66 F.3d 1489, 1490 (9th Cir. 1995) (internal citation omitted), *rev'd on other grounds by Wilderness Soc'y v. U.S. Forest Serv.*, 630 F.3d 1173 (9th Cir. 2011).<sup>4</sup> Intervention is warranted when the proposed intervenors “occup[y] a different position and [have] different interests” than the existing defendants. *Sierra Club v. Fed. Emergency Mgmt. Agency*, No. 07-0608, 2008 U.S. Dist. LEXIS 47405, at \*18-19 (S.D. Tex. June 11, 2008).

Although the Fifth Circuit recognizes two presumptions in favor of adequate representation when “the would-be intervenor has the same ultimate objective as a party to the lawsuit,” and when “when the putative representative is a governmental body or officer charged by law with representing the interests of the [intervenor],” *see Texas*, 805 F.3d at 661, *quoting Edwards v. City of Houston*, 78 F.3d 983, 1005 (5th Cir. 1996), that presumption is absent here because the federal government has taken the public position that DACA is unconstitutional.<sup>5</sup>

In addition to the statements by U.S. Attorney General Jeff Sessions, that DACA is “an unconstitutional exercise of authority by the Executive Branch”<sup>6</sup> and “vulnerable to the same legal and constitutional challenges that the courts recognized with respect to the DAPA

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<sup>4</sup> Other courts have recognized that governmental representation of private, non-governmental intervenors may be inadequate. For example, in *Dimond v. District of Columbia*, the court held that because the government was responsible for representing a broad range of public interests rather than the more narrow interests of intervenors, the “application for intervention . . . falls squarely within the relatively large class of cases in this circuit recognizing the inadequacy of governmental representation of the interests of private parties in certain circumstances.” 792 F.2d 179, 192 (D.C. Cir. 1986); *see Gen. Tel. Co. of the Nw., Inc. v. EEOC*, 446 U.S. 318, 331 (1980) (granting individual aggrieved party’s motion to intervene in order to protect its personal interests, which may at times be in conflict with those of the EEOC); *see also Natural Res. Def. Council v. Costle*, 561 F.2d 904, 911-12 (D.C. Cir. 1977) (holding that the government does not adequately represent private organizations because intervenors’ interests are different).

<sup>5</sup> *See* n. 2 above.

<sup>6</sup> *Id.*

program,”<sup>7</sup> the United States has referenced and relied upon the Attorney General’s statement that DACA is unconstitutional in all four cases challenging the attempted rescission of DACA. *See* Defs.’ Notice of Mot. and Mot. to Dismiss All S.D. Cal. DACA Cases, Mem. in Supp. at 39, *Regents of University of California, et al. v. U.S. Department of Homeland Security*, No. 3:17-cv-05211 (N.D.Cal. Nov. 1, 2017) (referencing “the Attorney General’s views regarding the legality of DACA”); Defs.’ Mot. to Dismiss or, in the Alternative, for Summ. J. at 31, *The Trustees of Princeton University, et al. v. U.S., et al.*, No. 1:17-cv-02325 (D.D.C. Nov. 22, 2017) (referencing “[t]he Attorney General’s determination that DACA was unconstitutional”); Defs.’ Mot. to Dismiss or, in the Alternative, for Summ. J. at 48, *Casa de Maryland, et al. v. U.S. Department of Homeland Security, et al.*, No. 8:17-cv-02942 (D.MD. Nov. 15, 2017) (“Here, the Attorney General regarded DACA as unconstitutional in part because it was an ‘open-ended’ policy that closely tracked ‘proposed legislation’ that Congress had repeatedly rejected”); Mem. of Law in Opp’n to Pls.’ Mot. for a Prelim. Inj., *Martin Jonathan Batalla Vidal, et al. v. Kirstjen M. Nielsen, et al.* at 15, No. 1:16-cv-04756 (E.D.N.Y. Jan. 13, 2018) (referencing “the Attorney General’s recommendation to rescind DACA, which explained that because DACA ‘has the same legal and constitutional defects that the courts recognized as to DAPA, it is likely that potentially imminent litigation would yield similar results’”).

For these same reasons, even if the Court were to apply the presumptions in favor of adequate representation, the Administration’s public position and court filings demonstrate adversity of interest sufficient to overcome the presumptions. *See Texas*, 805 F.3d at 662 (“In order to show adversity of interest, an intervenor must demonstrate that its interests diverge from the putative representative’s interests in a manner germane to the case”).

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<sup>7</sup> *Id.*



The adversity prong is easily satisfied here. Even assuming that the United States would reverse its adverse position on the legality of DACA in the other pending cases, and defend the initiative here as an appropriate exercise of prosecutorial discretion, Defendants and the Proposed Defendant-Intervenors' interests are profoundly different.

As explained by the Fifth Circuit in *Texas v. United States*, there are particular ways in which the interests of prospective beneficiaries of deferred action initiatives diverge from the interests of the U.S., including divergent interests regarding whether individuals with deferred action must be issued driver's licenses by the states in which they live. *Texas*, 805 F.3d at 663 (“The disagreement between the Government and the Jane Does on the driver's license issue arises directly from their divergent interests; the Government has an institutional interest in shielding its actions from state intervention through the courts, whereas the Jane Does' interest is in working and providing for their families, for which a driver's license is beneficial”).

Furthermore, Defendants are responsible for implementing DACA, but none of them are or ever will be directly affected by DACA. Defendants have no direct personal interest at stake. *See, e.g., Day*, 227 F.R.D. at 674 (“To the court's knowledge, none of these existing defendants are or ever will be personally impacted by [the in-state tuition law]”). Instead, Defendants will be merely required not to implement DACA. Not so for the Proposed Defendant-Intervenors if Plaintiffs are successful and obtain an injunction. The Proposed Defendant-Intervenors will experience severe and direct negative consequences, chief among them the constant fear of deportation.

The Proposed Defendant-Intervenors' interests are too divergent from the interests of Defendants, and too vital for the Proposed Defendant-Intervenors to be denied an active role as intervenor. *See id.* at 674-75 (granting intervention and recognizing direct and personal interests

of undocumented immigrant student in defending an in-state tuition law). For these reasons, the Proposed Defendant-Intervenors seek to participate in this case as intervenors and respectfully request that the Court grant them intervention as a matter of right.

**V. PERMISSIVE INTERVENTION IS ALSO APPROPRIATE**

Even if this Court were to determine that the Proposed Defendant-Intervenors do not satisfy the requirements for intervention as of right, it should grant permissive intervention. Rule 24(b)(1)(B) grants permissive intervention upon timely motion by anyone who “has a claim or defense that shares with the main action a common question of law or fact.” The Fifth Circuit has recognized that permissive intervention may be granted in the Court’s discretion if (1) the motion is timely; (2) an applicant’s claim or defense has a question of law or fact in common with the existing action; and (3) intervention will not delay or prejudice the adjudication of the rights of the original parties. Fed. R. Civ. P. 24(b); *see United States v. LULAC*, 793 F.2d 636, 644 (5th Cir. 1986) (“Although the court erred in granting intervention as of right, it might have granted permissive intervention under Rule 24(b) because the intervenors raise common questions of law and fact.”).

As a threshold matter, the Proposed Defendant-Intervenors’ motion to intervene is timely. *See supra* Section IV.A. Second, the Proposed Defendant-Intervenors’ defenses will share substantial questions of law and fact with the main action as the Proposed Defendant-Intervenors seek to preserve their deferred action grants pursuant to DACA. Third, as discussed above, intervention will not create delay or prejudice the existing parties. *See id.* Adding the Proposed Defendant-Intervenors as defendant-intervenors at this juncture of the lawsuit will not needlessly increase cost, delay disposition of the litigation, or prejudice the existing parties.

Importantly, the Proposed Defendant-Intervenors’ participation in this lawsuit will offer

evidence and argument from the young immigrants who are the real targets of this lawsuit and who have a direct and personal stake in the outcome of this case. At a minimum, therefore, the Proposed Defendant-Intervenors ask the Court to exercise its broad discretion and grant them permissive intervention.

## **VI. CONCLUSION**

For the foregoing reasons, the Proposed Defendant-Intervenors respectfully request that the Court grant their motion to intervene in this action as Defendants.

Dated: May 8, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on the eighth day of May, 2018, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYO-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

## **APPENDIX A: DECLARATIONS**

Pursuant to the Court’s Civil Procedures, rule 7(b), the Proposed Defendant-Intervenors Karla Perez, Maria Rocha, Jose Magaña-Salgado, Nanci J. Palacios Godinez, Elly Marisol Estrada, Karina Ruiz De Diaz, Carlos Aguilar Gonzalez, Karla Lopez, Luis A. Rafael, Darwin Velasquez, Jin Park, Oscar Alvarez, Nancy Adossi, Denise Romero, Pratishtha Khanna, Jung Woo Kim, Angel Silva, Moses Kamau Chege, Hyo-Won Jeon, Elizabeth Diaz, Maria Diaz, and

Blanca Gonzalez hereby provide the Court with a summary of declarations and copies of the following declarations cited in support of the Proposed Defendant-Intervenors' Motion for Leave to Intervene and Proposed Defendant-Intervenors' Memorandum of Law in Support of Their Motion for Leave to Intervene.

<b>NO.</b>	<b>DECLARATION</b>
1.	Summary of Declaration Testimony by Proposed Defendant Intervenors
2.	Declaration of Defendant Intervenor Movant Karla Perez
3.	Declaration of Defendant Intervenor Movant Maria Rocha
4.	Declaration of Defendant Intervenor Movant Jose Magaña-Salgado
5.	Declaration of Defendant Intervenor Movant Nanci J. Palacios Godinez
6.	Declaration of Defendant Intervenor Movant Elly Marisol Estrada
7.	Declaration of Defendant Intervenor Movant Karina Ruiz de Diaz
8.	Declaration of Defendant Intervenor Movant Carlos Aguilar Gonzalez
9.	Declaration of Defendant Intervenor Movant Karla Lopez
10.	Declaration of Defendant Intervenor Movant Luis A. Rafael
11.	Declaration of Defendant Intervenor Movant Darwin Velasquez
12.	Declaration of Defendant Intervenor Movant Jin Park
13.	Declaration of Defendant Intervenor Movant Oscar Alvarez
14.	Declaration of Defendant Intervenor Movant Nancy Adossi
15.	Declaration of Defendant Intervenor Movant Denise Romero

16.	Declaration of Defendant Intervenor Movant Pratishttha Khanna
17.	Declaration of Defendant Intervenor Movant Jung Woo Kim
18.	Declaration of Defendant Intervenor Movant Angel Silva
19.	Declaration of Defendant Intervenor Movant Moses Kamau Chege
20.	Declaration of Defendant Intervenor Movant Hyo-Won Jeon
21.	Declaration of Defendant Intervenor Movant Elizabeth Diaz
22.	Declaration of Defendant Intervenor Movant Maria Diaz
23.	Declaration of Defendant Intervenor Movant Blanca Gonzalez

Dated: May 8, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on the eighth day of May, 2018, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales



# APPENDIX A

## TAB 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYO-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

**SUMMARY OF DECLARATION TESTIMONY BY PROPOSED DEFENDANT-INTERVENORS**

Karla Perez lives in Houston, Texas, and is a DACA recipient. (Declaration of Karla Quetzalli Perez ¶¶ 1, 8). She was born in Mexico and came with her parents to the United States when she was two years old. (*Id.* ¶ 2) Ms. Perez graduated from Pasadena Memorial High School in Pasadena, Texas, where she was a member of the National Honor Society and captain of the varsity soccer team. (*Id.* ¶ 3) Ms. Perez graduated magna cum laude from the University of Houston, where she received a Bachelor's degree in Business Administration. (*Id.* ¶ 4) Ms. Perez is 25 years old and a third-year law student at the University of Houston Law Center. (*Id.* ¶ 5) As a law student, Ms. Perez has assisted attorneys at several non-profit organizations to

provide legal services to crime victims, DACA recipients, and immigrants who have survived gender-based violence. (*Id.* ¶ 6) She is a board member of United We Dream, the largest immigrant youth-led network in the United States. (*Id.* ¶ 7) Ms. Perez has served as the statewide coordinator of United We Dream legislative campaigns advocating for improved living conditions for immigrants in Texas. (*Id.*) Ms. Perez earned the Texas Center for Public Policy Priorities' 2015 Future of Texas Award, and *The Dallas Morning News* named her a 2015 Texan of the Year Finalist. (*Id.*)

Maria Rocha lives in San Antonio, Texas, and is a DACA recipient. (Declaration of Maria Rocha ¶¶ 1, 9). She was born in Mexico and came to the United States when she was three years old. (*Id.* ¶ 2) Ms. Rocha is now 30 years old and currently pursuing a master's degree through the Urban School Leader Collaborative program at the University of Texas at San Antonio (UTSA). (*Id.* ¶ 3) Ms. Rocha also works as a teacher in San Antonio teaching third grade students. (*Id.* ¶ 4) She worked as a teacher through the Teach for America program from 2015 to 2017, and is an active member of her community. (*Id.* ¶ 5) In 2011, she began volunteering with the Cesar Chavez Legacy and Educational Foundation to organize food drives and community events. (*Id.* ¶ 6) Ms. Rocha coaches soccer and basketball to lower elementary schoolchildren. (*Id.* ¶ 7) Ms. Rocha received an award from the elementary school at which she works for exemplifying the school's commitment to students. (*Id.* ¶ 8)

Jose Magaña-Salgado lives in Washington, D.C., and is a DACA recipient. (Declaration of Jose Magaña-Salgado ¶¶ 1, 7). He was born in Mexico and was brought by his parents to the United States in 1989 when he was two years old. (*Id.* ¶ 2) Mr. Magaña-Salgado graduated high school from St. Paul's Preparatory Academy in Phoenix, Arizona and was valedictorian of his high school class. (*Id.* ¶ 3) Mr. Magaña-Salgado earned his bachelor's degree from Arizona State University and his law degree from Baylor School of Law. (*Id.* ¶ 4) During law school, Mr. Magaña-Salgado assisted attorneys and non-profit organizations in providing legal services to crime victims, trafficking survivors, Temporary Protected Status (TPS) recipients, and immigrants seeking asylum and fleeing persecution. (*Id.*) Additionally, Mr. Magaña-Salgado co-founded the Dream Bar Association, a professional bar association led by and for undocumented immigrants. (*Id.* ¶ 6) Mr. Magaña-Salgado is now 31 years old and a small business owner. (*Id.* ¶¶ 4, 5) He provides consulting services to local, state, and national immigration non-profit organizations. (*Id.* ¶ 5) Previously, Mr. Magaña-Salgado worked as the Managing Policy Attorney at the Immigrant Legal Resource Center. (*Id.* ¶ 5) In that role, he developed education materials for attorneys and community members, advocated in Congress for comprehensive immigration reform, and appeared on national and local media to discuss immigration issues. (*Id.*)

Nanci J. Palacios Godinez lives in Seffner, Florida and is a DACA recipient. (Declaration of Nanci J. Palacios Godinez ¶¶ 1, 8). She was born in Mexico and came to the United States when she was six years old. (*Id.* ¶ 2) Ms. Palacios graduated in the top 10 percent of her class at Durant High School in Plant City, Florida, where she was a member of the National Honor Society and served as the president of the Spanish Honor Society. (*Id.* ¶ 3) Ms. Palacios holds an Associate's degree in Health Science from Hillsborough Community College. (*Id.* ¶ 4) While she was a student at Hillsborough Community College, she co-founded United We Dream-Tampa Bay and volunteered and served on the Steering Committee of the Florida

Immigrant Youth Network, a statewide coalition of organizations focused on immigrant rights. (*Id.*) Ms. Palacios is now 29 years old and attends University of South Florida in Tampa, Florida, where she is pursuing her bachelor's degree in Political Science with a minor in Anthropology. (*Id.* ¶ 5) Ms. Palacios works as a Congregation Organizer for the non-profit Faith in Florida and is an active member of her church. (*Id.* ¶¶ 6, 7)

Elly Marisol Estrada Cruz lives in Atlanta, Georgia and is a DACA recipient. (Declaration of Nanci J. Palacios Godinez ¶¶ 1, 7). She was born in Mexico and came to the United States with her family in 1999 when she was five years old. (*Id.* ¶ 2) She graduated from Sol C. Johnson High School in Savannah, Georgia in 2013. (*Id.* ¶ 3) Ms. Estrada excelled in high school and graduated in the top 10 percent of her class. (*Id.*) Ms. Estrada is 24 and a 2016 magna cum laude graduate of Armstrong State University, where she double majored in Political Science and Government and Spanish. (*Id.* ¶ 4) While in college, Ms. Estrada was a member of the Savannah Undocumented Youth Alliance, a student-run organization that advocates for access to higher education for undocumented students. (*Id.*) After college, Ms. Estrada worked as the deputy chief of staff for a state representative in Georgia. (*Id.* ¶ 5) She currently works as a legal assistant at an immigration law firm in the Atlanta area. (*Id.* ¶ 6)

Karina Ruiz De Diaz lives in Phoenix, Arizona, and is a DACA recipient. (Declaration of Karina Ruiz De Diaz ¶¶ 1, 9). Mrs. Ruiz De Diaz was born in Mexico City and came with her parents to the United States when she was 15 years old. (*Id.* ¶ 2) Mrs. Ruiz De Diaz graduated from Sunnyslope High School in Phoenix. (*Id.* ¶ 3) In high school, Mrs. Ruiz De Diaz was a member of the National Honor Society, the Spanish Honor Society, and the Air Force JROTC. (*Id.*) Mrs. Ruiz De Diaz earned a scholarship from the Sunburst Foundation to attend college. (*Id.* ¶ 4) She attended Arizona State University, from which she earned a Bachelor of Science in Biochemistry in 2015. (*Id.*) Mrs. Ruiz De Diaz is currently 33 years old and works as the Executive Director of the Arizona Dream Act Coalition, an immigrant youth-led organization focused on higher education and immigrant rights. (*Id.* ¶ 5) Mrs. Ruiz De Diaz is a licensed real estate agent and the mother of three United States citizen children. (*Id.* ¶¶ 6, 7) She is an active member of her church, a parent volunteer and President of the Mountain View Elementary School Parent Teacher Organization (PTO), where two of her children attend school, and a volunteer at HonorHealth John C. Lincoln Medical Center. (*Id.* ¶ 8) She is also a volunteer at One Arizona Table, an organization that promotes civic engagement among Latino and immigrant communities. (*Id.*)

Carlos Aguilar Gonzalez lives in Cambridge, Massachusetts and is a DACA recipient. (Declaration of Carlos Aguilar Gonzalez ¶¶ 1, 7). He was born in Mexico and was brought by his mother to the United States when he was fourteen years old. (*Id.* ¶ 2) Mr. Aguilar is now 27 years old and currently pursuing a Ph.D. in Education at the Harvard University Graduate School of Education. (*Id.* ¶ 4) Mr. Aguilar graduated from Tivy High School and earned his bachelor's degree in psychology from Schreiner University, then his master's degree in sociology from the University of Texas at San Antonio (UTSA). (*Id.* ¶ 3) During this time, Mr. Aguilar volunteered as the coordinator of Immigrant Youth Leadership at UTSA. (*Id.* ¶ 6) He also worked as a legal assistant at an immigration law firm in San Antonio. (*Id.* ¶ 5) Mr. Aguilar has also volunteered as a recurring guest speaker at family literacy programs discussing the importance of education with Latino parents, as an instructor of

English as a Second Language, as a presenter for non-profit citizenship and DACA workshops and as a data entry assistant for a non-profit organization that provides legal aid to unaccompanied child migrants. (*Id.* ¶ 6)

Karla Lopez lives in Mableton, Georgia and is a DACA recipient. (Declaration of Karla Lopez ¶¶ 1, 6). She was born in Mexico and was brought by her mother to the United States when she was eight years old. (*Id.* ¶ 2) Ms. Lopez graduated from Pebblebrook High School in Mableton, Georgia, where she participated in cheerleading and played the cello. (*Id.* ¶ 3) She graduated in the top 10 percent of her class with a 3.9 grade point average on a scale of 4.0. (*Id.*) She was a recipient of the Atlanta Journal Constitution Senior of the Year Scholarship for Pebblebrook High School and the Hispanic Scholarship Fund Scholarship. (*Id.*) Ms. Lopez is 23 and is pursuing her bachelor's degree in biology at Perimeter College in Atlanta, Georgia. (*Id.* ¶ 4) She is an active participant in her college community and has served as a student senator and secretary in her college's student government. (*Id.*) In addition to working toward her bachelor's degree, Ms. Lopez works full-time at a combination of two jobs. (*Id.* ¶ 5) Ms. Lopez is also active in her community and volunteers at a number of community organizations, including Hosea Feed the Hungry and the American Red Cross. (*Id.* ¶ 6)

Luis A. Rafael lives in Chicago, Illinois and is a DACA recipient. (Declaration of Luis A. Rafael ¶¶ 1, 7). He was born in Mexico and came to the United States with his mother when he was three years old. (*Id.* ¶ 2) Mr. Rafael graduated from Morton East High School and is currently a full-time student attending Northeastern University's STEM Pathway Initiative to teach robotics in low-income communities. (*Id.* ¶¶ 3, 4) Mr. Rafael has worked as a campaign manager for Chicago-area elections in a paid and volunteer capacity. (*Id.* ¶ 5) Mr. Rafael has also worked in a coffee shop. (*Id.*) Mr. Rafael is 23 years old and currently volunteers his time with various Chicago-based organizations, including New Generation of Leadership, a group of Latinos organizing to seek social justice in the suburb of Cicero, and Increase the Peace, a youth-led initiative to decrease gun violence in the Chicago neighborhood of Englewood. (*Id.* ¶¶ 4, 6)

Darwin Velasquez lives in Colma, California and is a DACA recipient. (Declaration of Darwin Velasquez ¶¶ 1, 7). He was born in El Salvador and came to the United States in 2007 when he was 12 years old. (*Id.* ¶ 2) Mr. Velasquez graduated from George Washington High School where he completed advanced placement coursework, was named Mock-Trial All-Star by the Bar Association of San Francisco, was a representative to the San Francisco Public Schools Student Advisory Council, and was named graduation speaker for College Track Bay Area. (*Id.* ¶ 3) Mr. Velasquez is 23 years old and in 2017 earned a bachelor's degree from University of San Francisco in International Studies and Global Politics with a minor in European Studies. (*Id.* ¶ 4) Mr. Velasquez currently works as the National Dream Coordinator for College Track, a national college access program, where he counsels over 250 Dreamers. (*Id.* ¶ 5) Mr. Velasquez previously served as Outreach Ambassador to Educators for Fair Consideration where he advocated for higher education for undocumented youth. (*Id.* ¶ 6) Mr. Velasquez also volunteered with the San Francisco Recreation and Park Department where he ran programs for disabled youth and seniors, and volunteered at a summer camp for the visually impaired. (*Id.*) In 2013 the San Francisco Youth Commission awarded Mr. Velasquez the Youth of the Year

Award for his leadership and strong civic engagement for positive change in his community. (*Id.*)

Jin Park lives in Cambridge, Massachusetts, and is a DACA recipient. (Declaration of Jin Park ¶¶ 1, 14). He was born in South Korea and was brought by his parents to the United States when he was seven years old. (*Id.* ¶ 2) Mr. Park is now 22 years old and an undergraduate student at Harvard College studying molecular and cellular biology with a minor in government and plans to apply to medical school after he graduates college. (*Id.* ¶ 3, 4) He is currently employed at a university cancer research institute in Cambridge, Massachusetts. (*Id.* ¶ 5) Mr. Park previously worked at the New York City Mayor's Office, where he helped implement a care coordination program for undocumented immigrants in the City. (*Id.* ¶ 6) He served as the director of naturalization assistance programs at Harvard, which provides services to low-income immigrants, primarily from Boston's Chinatown. (*Id.* ¶ 7) Mr. Park incorporated his own 501(c)(3) organization ("HigherDreams, Inc."), which provides training and direct services to undocumented high school students in Boston. (*Id.* ¶ 8) HigherDreams has recently partnered with Boston Public Schools to provide trainings to guidance counselors in the district regarding the unique challenges that undocumented students face. (*Id.* ¶ 9) For his work with HigherDreams, the White House selected Mr. Park as a "Champion of Change" for college opportunity in November 2016. (*Id.* ¶ 10) He was also named a White House Asian-American and Pacific Islander Initiative Spokesperson during President Obama's tenure. (*Id.* ¶ 11) At Harvard, Mr. Park is the recipient of the Harvard Presidential Public Service fellowship and was named a John Harvard Scholar. (*Id.* ¶ 12) Mr. Park was also selected as the 2018 Harvard Orator, one of two student speakers to address the Class of 2018 on Class Day. (*Id.* ¶ 13)

Oscar Alvarez lives in Los Angeles, California, and is a DACA recipient. (Declaration of Oscar Alvarez ¶¶ 1, 6). He was born in Mexico and was brought by his parents to the United States in 1997 when he was two years old. (*Id.* ¶ 2) Mr. Alvarez graduated from Ánimo Ralph Bunche Charter High School in Los Angeles. (*Id.* ¶ 3) He was a member of the leadership committee of the National Honor Society at his high school and he volunteered with A Place Called Home, a non-profit organization that provides educational programming for youth of color in Los Angeles. (*Id.*) Mr. Alvarez is now 23 years old and currently pursuing a Bachelor's degree in American Studies with a focus in Public Policy and Education at the University of California, Berkeley. (*Id.* ¶ 4) Mr. Alvarez was a 2016 Fellow with the Public Policy and International Affairs (PPIA) Program at the Goldman School of Public Policy; the PPIA Program promotes the inclusion of students from underserved communities in the public sector and helps prepare those students for graduate level programs and careers in public service. (*Id.*) Mr. Alvarez previously co-led a student group, *Casa Sin Fronteras*, that helps connect undocumented students to housing or assistance while in school and raises awareness about undocumented students and homelessness. (*Id.*) Mr. Alvarez previously interned in Congress through the Congressional Hispanic Caucus Institute, where he worked with Congresswoman Linda Sanchez. (*Id.* ¶ 5)

Dr. Nancy Adossi lives in Houston, Texas and is a DACA recipient. (Declaration of Nancy Adossi ¶¶ 1, 9). She was born in Lomé, Togo and was brought to the United States by her parents when she was nine years old. (*Id.* ¶ 2) Dr. Adossi graduated from the magnet program at George W. Carver High School in the top 10 percent of her class. (*Id.* ¶ 3) She received a



bachelor's degree in Political Science and International Relations from the University of Houston, where she graduated as the valedictorian and was keynote speaker for her class. (*Id.* ¶ 4) Dr. Adossi earned a master's degree in Public Administration from the University of Houston, which awarded her the 2013 Master's in Public Administration Alumni Award. (*Id.* ¶ 5) She also holds a Doctorate of Education in Health Sciences Technology from the University of Houston. (*Id.* ¶ 6) She was the youngest graduate of that program. (*Id.*) Dr. Adossi is 28 years old and currently works as a sixth grade teacher in the social studies program at Paul Revere Middle School. (*Id.* ¶ 7) She also works as a research consultant with Lift a Village and the UndocuBlack Network and has previously worked as a research consultant with the Black Alliance for Just Immigration. (*Id.* ¶ 8)

Denise Romero lives in New York City, New York, and is a DACA recipient. (Declaration of Denise Guadalupe Romero Gonzalez ¶¶ 1, 7). She was born in Mexico and came to the United States in 2001 when she was nine years old. (*Id.* ¶ 2) Ms. Romero graduated from Long Island City High School, where she participated in Global Kids, a nonprofit educational organization and leadership program that sparked her interest in advocacy and grassroots organizing. (*Id.* ¶ 3) She is 26 years old and currently pursuing a Bachelor's degree in Journalism from Lehman College at The City University of New York. (*Id.* ¶ 4) Ms. Romero works as a paralegal and organizer at Mobilization for Justice, a nonprofit organization that provides free legal assistance to low-income tenants in New York. (*Id.* ¶ 5) Ms. Romero also volunteers with the New York State Youth Leadership Council, the first undocumented youth-led organization in New York, where she has served as a speaker for the organization. (*Id.* ¶ 6)

Pratishtha Khanna lives in Burtonsville, Maryland and is a DACA recipient. (Declaration of Pratishtha Khanna ¶¶ 1, 8). She was born in India and came to the United States in 2002 when she was 10 years old. (*Id.* ¶ 2) Ms. Khanna graduated from Reservoir High School where she served as student government treasurer and vice president, and served as president of the Oprah's Ambassadors Program, a student organization that helped raise funds and resources for rural West African schools. (*Id.* ¶ 3) Ms. Khanna is 26 years old and earned a bachelor's degree in biological sciences from University of Maryland Baltimore County in 2014. (*Id.* ¶¶ 4, 5) In August 2018 she will begin studies at Western University of Health Sciences, Graduate College of Biomedical Sciences to pursue a master's degree in Biomedical Sciences. (*Id.* ¶ 4) Ms. Khanna currently works full-time at a hospital in Baltimore, Maryland as a Clinical Technician in a Medical Intensive Care Unit and previously worked part-time at the University of Maryland Baltimore Washington Medical Center as an Emergency Department Scribe. (*Id.* ¶ 6) Ms. Khanna participates in Pre-Health Dreamers, a community of undocumented students pursuing careers in health. (*Id.* ¶ 7)

Jung Woo Kim lives in Los Angeles, California and is a DACA recipient. (Declaration of Jung Woo Kim ¶¶ 1, 8). Mr. Kim came to the United States from South Korea when he was 15 years old. (*Id.* ¶ 2) He graduated from Buena Park High School. (*Id.* ¶ 3) Mr. Kim, now 33 years old, holds a Bachelor's degree *cum laude* in Kinesiology from California State University-Fullerton. (*Id.* ¶ 4) Mr. Kim works as a Membership Development Manager at the Korean Resource Center in Los Angeles and also works as the National Campaign Director at the National Korean American Service & Education Consortium, a national grassroots organization

focused on social, economic and racial justice. (*Id.* ¶¶ 5, 6) Mr. Kim is also a licensed real estate agent in California. (*Id.* ¶ 7)

Angel Silva lives in Silver Spring, Maryland and is a DACA recipient. (Declaration of Angel Silva ¶¶ 1, 7). He was born in Mexico and was brought by his parents to the United States as a one year old in 1993. (*Id.* ¶ 2) Mr. Silva graduated from John H. Francis Polytechnic High School in Sun Valley, California. (*Id.* ¶ 3) He participated in his high school's academic decathlon and served as editor-in-chief of the school newspaper. (*Id.* ¶ 3) Mr. Silva is 25 years old and earned a bachelor's degree in Journalism with a minor in Political Science from California State University, Northridge. (*Id.* ¶ 4) Mr. Silva previously attended Glendale Community College in Glendale, California, where he was a managing editor of the college newspaper. (*Id.*) While in college, Mr. Silva helped develop the DREAM Center, a resource center to help undocumented students access in-state tuition, connect with other undocumented students, and learn about services available to the undocumented student body. (*Id.*) Mr. Silva also volunteered with the California Dream Network, a group of undocumented students and allies that advocates for greater education access for undocumented students and civic engagement in immigrant communities. (*Id.*) Mr. Silva interned through the Congressional Hispanic Caucus Institute and worked with Congresswoman Linda Sanchez. (*Id.*) Mr. Silva currently works at the Congressional Hispanic Caucus Institute in Washington, D.C. as the Scholarship and Administration Specialist. (*Id.* ¶ 5) In that role, he manages the Scholar Intern Programs which provide students with scholarships and paid internships at community-based health organizations. (*Id.*) Mr. Silva volunteers with the Gilchrist Immigrant Resource Center in Montgomery County, Maryland, where he works to create a new program for immigrants to gain skills and resources to enter the workforce or start their own businesses. (*Id.* ¶ 6)

Moses Kamau Chege lives in Spokane, Washington and is a DACA recipient. (Declaration of Moses Kamau Chege ¶¶ 1, 8). He was born in Kenya and was brought by his mother to the United States when he was six years old. (*Id.* ¶ 2) Mr. Chege graduated from Stadium High School in Tacoma, where he participated in varsity cross country and track and field and was a cadet commander of the Navy JROTC. (*Id.* ¶ 3) In high school, Mr. Chege participated in the Running Start program at Tacoma Community College and received his associate's degree a few months after his high school graduation. (*Id.*) Mr. Chege is 23 years old and currently pursuing a Bachelor's of Business Administration in Accounting from Whitworth University. (*Id.* ¶ 4) He is the recipient of the Act Six Scholarship, a full-tuition scholarship from the Northwest Leadership Foundation. (*Id.* ¶ 5) Mr. Chege works as a Cultural Events Coordinator at Whitworth University. (*Id.* ¶ 6) He also co-founded and volunteers at Spokane Dream Project, an organization advocating for undocumented students in the Spokane community. (*Id.* ¶ 7)

Hyo-Won Jeon lives in Chicago, Illinois and is a DACA recipient. (Declaration of Hyo-Won Jeon ¶¶ 1, 8). She was born in South Korea and came with her parents to the United States when she was three years old. (*Id.* ¶ 2) Ms. Jeon graduated from high school in Houston, Texas, where she participated in the National Honor Society and graduated as valedictorian. (*Id.* ¶ 3) Ms. Jeon is 23 years old and pursuing a Bachelor of Arts in Social Studies from Harvard University. (*Id.* ¶ 4) Ms. Jeon is currently taking a one-year leave of absence from Harvard to work at the National Korean American Service & Education Consortium as an Immigrant Rights Fellow in Chicago. (*Id.* ¶ 5) At Harvard, she volunteers as Senior Advisor for the Asian



American Women's Association and is a Leader at the First Year Urban Program, a mentorship program for freshmen students who are interested in public interest careers. (*Id.* ¶ 6) Ms. Jeon was the recipient of the Harvard Foundation Award for Race Relations her sophomore and junior years at the university. (*Id.* ¶ 7)

Elizabeth Diaz lives in McAllen, Texas and is a DACA recipient. (Declaration of Elizabeth Diaz Sanchez ¶¶ 1, 7). Ms. Diaz was born in Mexico and was brought by her parents to the United States when she was six years old. (*Id.* ¶ 2) Ms. Diaz graduated from Juarez-Lincoln High School. (*Id.* ¶ 3) Ms. Diaz is 23 years old and earned an associate's Degree in early education from South Texas College. (*Id.* ¶ 4) While at South Texas College, Ms. Diaz participated in Valley Scholars, a community service organization, and volunteered with Mothers Against Drunk Driving. (*Id.*) Ms. Diaz has a certified nursing assistant certification and physical therapy technician certification from the New Start School. (*Id.* ¶ 5) Ms. Diaz is married and works as a relocation manager for a security company in McAllen, Texas. (*Id.* ¶ 6)

Maria Diaz lives in Mission, Texas and is a DACA recipient. (Declaration of Maria Diaz ¶¶ 1, 6). She was born in Mexico and was brought by her parents to the United States when she was 12 years old. (*Id.* ¶ 2) Ms. Diaz graduated from the South Texas High School for Health Professions. (*Id.* ¶ 3) Ms. Diaz then graduated with her nursing degree from The University of Texas Rio Grande Valley. (*Id.* ¶ 4) Ms. Diaz is 29 years old and works as a nurse at a hospital in Edinburg, Texas. (*Id.* ¶¶ 4, 5)

Blanca Gonzalez lives in Mission, Texas and is a DACA recipient. (Declaration of Blanca Gonzalez ¶¶ 1, 7). She was born in Mexico and was brought by her parents to the United States when she was nine years old. (*Id.* ¶ 2) Ms. Gonzalez graduated from Juarez-Lincoln High School in La Joya, Texas where she participated in the student council. (*Id.* ¶ 3) Ms. Gonzalez is 27 years old and earned her Associate's Degree in Criminal Justice and Education from South Texas College, where she participated in the student criminal justice society. (*Id.* ¶ 4) Ms. Gonzalez is married and has a six-year old daughter who is a U.S. citizen. (*Id.* ¶ 6) Ms. Gonzalez currently works as an assistant manager at a restaurant in Palmhurst, Texas. (*Id.* ¶ 5)

# APPENDIX A

## TAB 2



3. I graduated from Pasadena Memorial High School in Pasadena, Texas, where I was a member of the National Honor Society and captain of the varsity soccer team.
4. I graduated magna cum laude from the University of Houston, where I received a Bachelor of Business Administration in Marketing and a minor in Mexican American Studies.
5. I am 25 years old and a third-year law student at the University of Houston Law Center.
6. As a law student, I have worked with several non-profit organizations to provide legal services to crime victims, DACA recipients and immigrants who have survived gender-based violence.
7. I am a board member of United We Dream (UWD), the largest immigrant youth-led network in the United States. I have served as the statewide coordinator of UWD legislative campaigns advocating for improved living conditions for immigrants in Texas. In recognition for my community service, I earned the Texas Center for Public Policy Priorities' 2015 Future of Texas Award, and the Dallas Morning News named me a 2015 Texan of the Year Finalist.
8. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014, 2016 and 2018.
9. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work

in the United States and losing deferred action would impose a great hardship on me.

10. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in Houston, Harris County, Texas.

Karla Perez

Signature

Karla Quetzalli Perez Ramirez

Printed Name

# APPENDIX A

## TAB 3





3. I am thirty years old and currently pursuing a master's degree through the Urban School Leader Collaborative program at the University of Texas at San Antonio.
4. I work as a third grade teacher in San Antonio.
5. I also worked as a teacher through the Teach for America program from 2015 to 2017.
6. I volunteered with the Cesar Chavez Legacy and Educational Foundation to organize food drives and community events beginning in 2011.
7. I coach soccer and basketball to lower elementary schoolchildren.
8. I received an award from the elementary school at which I work for exemplifying the school's commitment to students
9. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA).
10. Since initially receiving DACA, I successfully renewed my deferred action in 2017.
11. I have lived in the United States for most of my life and I wish to remain in the United States.
12. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
13. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in San Antonio, TX

Maria Rocha  
Signature

Maria Rocha  
Printed Name

# APPENDIX A

## TAB 4



3. I graduated from St. Paul's Preparatory Academy in Phoenix, Arizona, where I was valedictorian of my high school class.
4. I am 31 years old and earned a Bachelor's degree from Arizona State University and a law degree from Baylor School of Law. During law school, I assisted attorneys and non-profit organizations in providing legal services to crime victims, trafficking survivors, Temporary Protected Status (TPS) recipients, and immigrants seeking asylum and fleeing persecution.
5. I am a small business owner. I provide consulting services to local, state, and national immigration non-profit organizations. Previously, I worked as the Managing Policy Attorney at the Immigrant Legal Resource Center. In that role, I developed education materials for attorneys and community members, advocated in Congress for comprehensive immigration reform, and appeared on national and local media to discuss immigration issues.
6. I also co-founded the Dream Bar Association, a professional bar association led by and for undocumented immigrants.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014, 2016, and 2018.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.

9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in \_\_\_\_\_ Washington, D.C.



\_\_\_\_\_  
Signature

Jose Magana-Salgado

\_\_\_\_\_  
Printed Name

# APPENDIX A

## TAB 5






3. I graduated in the top 10% of my class at Durant High School in Plant City, Florida, where I was a member of the National Honor Society and served as President of the Spanish Honor Society.
4. I earned an Associate's degree in Health Science from Hillsborough Community College. While I was a student at Hillsborough Community College, I co-founded United We Dream-Tampa Bay and volunteered and served on the Steering Committee of the Florida Immigrant Youth Network, a statewide coalition of organizations focused on immigrant rights.
5. I am 29 years old and attend the University of South Florida in Tampa, Florida, where I am pursuing my Bachelor's degree in Political Science with a minor in Anthropology.
6. I work as a Congregation Organizer for the non-profit Faith in Florida.
7. I am an active member of my church.
8. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and October of 2016.
9. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
10. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in Seffner, Florida.



Signature

Nanci Judith Palacios Godinez

Printed Name

# APPENDIX A

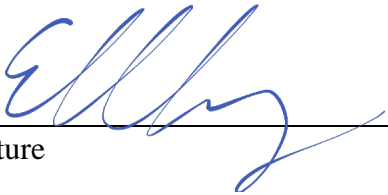
## TAB 6



3. I graduated from Sol C. Johnson High School in Savannah Georgia, where I graduated in the top ten percent of my class.
4. I am 24 and earned a bachelor of arts in Political Science and Government, and Spanish from Armstrong State University, where I graduated magna cum laude. While in college, I was an active member of the Savannah Undocumented Youth Alliance, a student-run organization that advocates for access to higher education for undocumented students.
5. After college, I worked as the Deputy Chief of Staff for a state representative in Georgia.
6. I currently work as a Legal Assistant at Kuck Baxter Immigration Partners, an Immigration law firm based in Atlanta, Georgia.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and 2017.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in Fulton County, GA.

  
\_\_\_\_\_  
Signature

Elly Marisol Estrada Cruz  
\_\_\_\_\_  
Printed Name

# APPENDIX A

## TAB 7





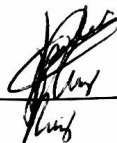
3. I graduated from Sunnyslope High School in Phoenix, where I participated in the National Honor Society, the Spanish Honor Society, the Air Force JROTC, and the Cesar E. Chavez Leadership Institute.
4. I graduated from Arizona State University in 2015 with a Bachelor of Science in Biochemistry. I earned a scholarship from the Sunburst Foundation to attend college.
5. I am 33 years old and currently working as the Executive Director of the Arizona Dream Act Coalition, an immigrant youth-led organization focused on higher education and immigrant rights.
6. I am a licensed real estate agent.
7. I am the mother of three United States citizen children.
8. I am also an active member of my church, a parent volunteer and President of the Mountain View Elementary School Parent Teacher Organization (PTO), where two of my children attend, and a volunteer at HonorHealth John C. Lincoln Medical Center. I am also a volunteer at One Arizona Table, an organization that promotes civic engagement among Latino and immigrant communities.
9. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2015 and 2017.
10. I have lived in the United States for more than half of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me and my children.

11. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7<sup>th</sup> day of May, 2018 in Phoenix, AZ.

Signature



Karina Isabel Rin De Diaz

Printed Name

# APPENDIX A

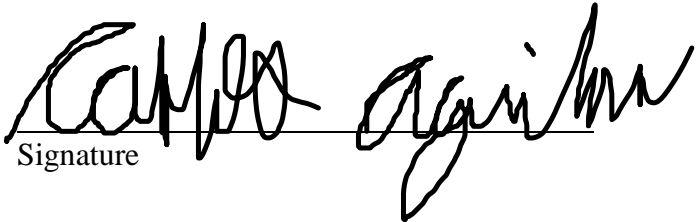
## TAB 8



3. I graduated from Tivy High School and earned my bachelor's degree in psychology from Schreiner University, then my master's degree in sociology from the University of Texas at San Antonio (UTSA).
4. I am twenty-seven years old and currently pursuing a PhD in Education at the Harvard University Graduate School of Education.
5. I worked as a legal assistant at an immigration law firm in San Antonio.
6. I also volunteered as the coordinator of Immigrant Youth Leadership at UTSA, as a recurring guest speaker at family literacy programs discussing the importance of education with Latino parents, as an instructor of English as a Second Language, as a presenter for non-profit citizenship and DACA workshops and as a data entry assistant for non-profit legal aid to unaccompanied child migrants.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and November 2016.
8. I have lived in the United States for almost half of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in Cambridge, MA.

  
Signature

Carlos Aguilar

\_\_\_\_\_  
Printed Name



# APPENDIX A

## TAB 9



3. I graduated from Pebblebrook High School in Mableton, Georgia, where I graduated in the top ten percent of my class with a 3.9 grade point average out of 4.0. I also received the Atlanta Journal Constitution Senior of the Year Scholarship and the Hispanic Scholarship Fund Scholarship.
4. I am 23 and pursuing a bachelor's degree in Biology at Perimeter College in Atlanta, Georgia. While at Perimeter, I have been active in my college community and have served as a senator and secretary in the college's student government.
5. I work a full-time at a combination of two jobs, in addition to attending school.
6. I also volunteer at a number of community organizations, including Hosea Feed the Hungry and the American Red Cross.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2015 and 2017.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in San Juan P.R.  
[Signature]  
Signature

Karla López  
Printed Name

# APPENDIX A

## TAB 10

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, MARIA ROCHA,	§	
JOSE MAGAÑA-SALGADO,	§	
NANCI J. PALACIOS GODINEZ,	§	
ELLY MARISOL ESTRADA, KARINA	§	
RUIZ DE DIAZ, CARLOS AGUILAR	§	
GONZALEZ, KARLA LOPEZ, LUIS A.	§	
RAFAEL, DARWIN VELASQUEZ,	§	
JIN PARK, OSCAR ALVAREZ,	§	
NANCY ADOSSI, DENISE ROMERO,	§	
PRATISHTHA KHANNA, JUNG WOO	§	
KIM, ANGEL SILVA, MOSES KAMAU	§	
CHEGE, HYO-WON JEON, ELIZABETH	§	
DIAZ, MARIA DIAZ, and BLANCA	§	
GONZALEZ,	§	
	§	
Proposed Defendant-	§	
Intervenors.	§	

**DECLARATION OF LUIS ALDAIR RAFAEL**

My name is Luis Aldair Rafael. I am over the age of 18 and fully competent to make this declaration.

1. I live in Chicago, Illinois.
2. I was born in Mexico and was brought by my parents to the United States when I was three years old.

3. I graduated from Morton East High School.
4. I am twenty-three years old and a full-time student attending Northeastern University's STEM Pathway Initiative to teach robotics in low income communities.
5. I have also worked in a coffee shop, and worked as a campaign manager for Chicago-area elections in a paid and volunteer capacity.
6. I also volunteer with various Chicago-based organizations, including New Generation of Leadership, a group of Latinos organizing to seek social justice in the suburb of Cicero; and Increase the Peace, a youth led initiative to decrease gun violence in the Chicago neighborhood of Englewood.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2015 and 2017.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this \_\_7\_\_ day of May, 2018 in \_\_\_\_Chicago, IL \_\_\_\_\_.



\_\_\_\_\_  
Signature

Luis Aldair Rafael

\_\_\_\_\_  
Printed Name



# APPENDIX A

## TAB 11

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, MARIA ROCHA,	§	
JOSE MAGAÑA-SALGADO,	§	
NANCI J. PALACIOS GODINEZ,	§	
ELLY MARISOL ESTRADA, KARINA	§	
RUIZ DE DIAZ, CARLOS AGUILAR	§	
GONZALEZ, KARLA LOPEZ, LUIS A.	§	
RAFAEL, DARWIN VELASQUEZ,	§	
JIN PARK, OSCAR ALVAREZ,	§	
NANCY ADOSSI, DENISE ROMERO,	§	
PRATISHTHA KHANNA, JUNG WOO	§	
KIM, ANGEL SILVA, MOSES KAMAU	§	
CHEGE, HYO-WON JEON, ELIZABETH	§	
DIAZ, MARIA DIAZ, and BLANCA	§	
GONZALEZ,	§	
	§	
Proposed Defendant-	§	
Intervenors.	§	

**DECLARATION OF DARWIN VELASQUEZ**

My name is Darwin Velasquez. I am over the age of 18 and fully competent to make this declaration.

1. I live in Colma, California.
2. I was born in El Salvador and came to the United States when I was twelve years old.

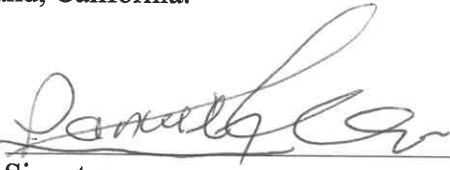
3. I graduated from George Washington High School, where I completed advanced placement coursework, was named Mock-Trial All-Star by the Bar Association of San Francisco, was a representative to the San Francisco Public Schools Student Advisory Council, and was named graduation speaker for College Track Bay Area.
4. I am twenty three years old and earned a bachelor's degree from University of San Francisco in International Studies and Global Politics with a minor in European Studies in 2017.
5. I work as the National Dream Coordinator for College Track, a national college access program, where I counsel over two hundred fifty Dreamers.
6. I also previously served as Outreach Ambassador to Educators for Fair Consideration where I advocated for higher education for undocumented youth. I also volunteered with the San Francisco Recreation and Park Department where I ran programs for disabled youth and seniors, and volunteered at a summer camp for the visually impaired. In 2013 the San Francisco Youth Commission awarded me the Youth of the Year Award for my leadership and strong civic engagement for positive change in my community.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2015 and 2017.
8. I have lived in the United States for almost half of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and

work in the United States and losing deferred action would impose a great hardship on me.

9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in Oakland, California.

  
Signature

Darwin Velasquez

Printed Name

# APPENDIX A

## TAB 12

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYO-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

### DECLARATION OF JIN PARK

My name is Jin Park. I am over the age of 18 and fully competent to make this declaration.

1. I live in Cambridge, Massachusetts.
2. I was born in South Korea and was brought by my parents to the United States when I was seven years old.


3. I am twenty-two years old and currently an undergraduate student at Harvard College studying molecular and cellular biology with a minor in government.
4. I plan to apply for medical school after I graduate from college.
5. I work at a university cancer research institute in Cambridge, Massachusetts.
6. I also worked at the New York City Mayor's Office where I helped implement a care coordination program for undocumented immigrants.
7. I served as the director of naturalization assistance programs at Harvard, which provides services to low-income immigrants, primarily from Boston's Chinatown.
8. I incorporated my own 501(c)(3) organization, HigherDreams, Inc., to provide training and direct services to undocumented high school students in Boston.
9. HigherDreams has recently partnered with Boston Public Schools to provide trainings to guidance counselors in the district regarding the unique challenges that undocumented students face.
10. For my work with HigherDreams, I was selected by the White House as a "Champion of Change" for college opportunity in November 2016.
11. I was also named a White House Asian-American and Pacific Islander Initiative Spokesperson during President Obama's tenure.
12. At Harvard, I received the Harvard Presidential Public Service fellowship and was named a John Harvard Scholar.
13. I was also selected as the 2018 Harvard Orator, one of two students to address the Class of 2018 on Class Day.



14. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014, 2016, and 2018.
15. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
16. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in Cambridge, MA.

  
\_\_\_\_\_  
Signature

JIN PARK  
\_\_\_\_\_  
Printed Name

# APPENDIX A

## TAB 13



3. I graduated from Ánimo Ralph Bunche Charter High School in Los Angeles, where I was a member of the leadership committee of the National Honor Society. I also volunteered with A Place Called Home, a non-profit organization that provides educational programming for youth of color in Los Angeles.
4. I am 23 years old and currently pursuing a Bachelor's degree in American Studies with a focus in Public Policy and Education at the University of California, Berkeley. I was a 2016 Fellow with the Public Policy and International Affairs Program at the Goldman School of Public Policy, which promotes the inclusion of students from under-served communities the public sector and helps prepare those students for graduate level programs and careers in public service. I previously co-led a student group, *Casa Sin Fronteras*, that helps connect undocumented students to housing or assistance while at school and raises awareness about undocumented students and homelessness.
5. I also interned in Congress through the Congressional Hispanic Caucus Institute, where I worked with Congresswoman Linda Sanchez.
6. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and November 2016.
7. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.

8. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7<sup>th</sup> day of May, 2018 in Los Angeles, California.

A handwritten signature in black ink, appearing to read "Oscar Alvarez Mejia", written over a horizontal line.

Signature

Oscar Alvarez Mejia

Printed Name

# APPENDIX A

## TAB 14





3. I graduated from George W. Carver High School in the top 10% of my class.
4. I received a Bachelor's degree in Political Science and International Relations from the University of Houston, where I graduated as the valedictorian and was keynote speaker for my class.
5. I also earned a Master's degree in Public Administration from the University of Houston, which awarded me the 2013 Master's in Public Administration Alumni Award.
6. I hold a Doctorate of Education in Health Sciences Technology from the University of Houston. I was the youngest graduate of my doctoral program.
7. I am 28 years old and currently work as a 6<sup>th</sup> grade teacher in the social studies program at Paul Revere Middle School.
8. I also work as a research consultant with Lift a Village and the UndocuBlack Network. I have previously worked as a research consultant with the Black Alliance for Just Immigration.
9. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2015 and 2017.
10. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
11. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in Houston, Texas.

Nancy Aiozzi  
Signature

NANCY AIOZZI  
Printed Name

# APPENDIX A

## TAB 15



3. I graduated from Long Island City High School, where I participated in Global Kids, a nonprofit educational organization and leadership program that sparked my interest in advocacy and grassroots organizing.
4. I am 26 years old and currently pursuing a Bachelor's degree in Journalism from Lehman College at The City University of New York.
5. I work as a paralegal and organizer at Mobilization for Justice, a nonprofit organization that provides free legal assistance to low-income tenants in New York.
6. I also volunteer with the New York State Youth Leadership Council, the first undocumented youth-led organization in New York, where I have served as a speaker for the organization.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in October 2016.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7<sup>th</sup> day of May, 2018 in New York, NY.

  
\_\_\_\_\_  
Signature

Denise Romero  
\_\_\_\_\_  
Printed Name

# APPENDIX A

## TAB 16





3. I graduated from Reservoir High School, where I served as student government treasurer and vice president, and served as President of the Oprah's Ambassadors Program, a student organization that helped raise funds and resources for rural West African schools.
4. I am twenty six years old and will begin studies at Western University of Health Sciences, Graduate College of Biomedical Sciences in August of 2018 to pursue a master's degree in Biomedical Sciences.
5. I earned a bachelor's degree in biological sciences from University of Maryland Baltimore County in 2014.
6. I work full-time at a hospital in Baltimore, Maryland as a Clinical Technician in ICU, and I previously worked part-time at the University of Maryland Baltimore Washington Medical Center as an emergency department scribe.
7. I participate in Pre-Health Dreamers, an informal association of over eight hundred undocumented students pursuing careers in health.
8. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and October 2016.
9. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
10. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in Burtonsville, Maryland.



---

Signature

Pratishtha Khanna

---

Printed Name

# APPENDIX A

## TAB 17



3. I graduated from Buena Park High School.
4. I am 33 years old and earned a Bachelor's degree *cum laude* in Kinesiology from California State University-Fullerton.
5. I work as a Membership Development Manager at the Korean Resource Center.
6. I also work as the National Campaign Director at the National Korean American Service & Education Consortium, a national grassroots organization focused on social, economic and racial justice.
7. I am a licensed real estate agent in California.
8. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and 2017.
9. I have lived in the United States for more than half of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
10. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in Los Angeles.

Signature

A handwritten signature in black ink, appearing to be 'Jung Woo Kim', written in a cursive style.

Printed Name Jung Woo Kim

# APPENDIX A

## TAB 18





3. I graduated from John H. Francis Polytechnic High School, where I participated in my high school's academic decathlon team and served as editor-in-chief of the school newspaper.
4. I am 25 years old and earned a bachelor's degree in Journalism with a minor in Political Science from California State University, Northridge. I previously attended Glendale Community College in Glendale, California, where I was a managing editor of the college newspaper. While at California State University, Northridge, I helped develop the DREAM Center, a resource center to help undocumented students access in-state tuition, connect with other undocumented students, and learn about services available to the undocumented student body. I also volunteered with the California Dream Network, a group of undocumented students and allies that advocates for greater education access for undocumented students and civic engagement in immigrant communities. I interned through the Congressional Hispanic Caucus Institute, and worked with Congresswoman Linda Sanchez.
5. I work as the Scholarship and Administration Specialist at the Congressional Hispanic Caucus Institute. In that role, I manage primarily the Scholar Intern Programs which provide students with scholarships and paid internships at community-based health organizations.
6. I also volunteer with the Gilchrist Immigrant Resource Center in Montgomery County, Maryland, where I help develop resources and programs for immigrants to gain skills and resources to enter the workforce or start their own businesses.

7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2015 and 2017.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in Washington, DC.

  
Signature

Angel Silva  
Printed Name

# APPENDIX A

## TAB 19



3. I graduated from Stadium High School, where I participated in varsity cross country and track and field and was a cadet commander of the Navy JROTC. In high school, I also participated in the Running Start program at Tacoma Community College, receiving my Associate's degree a few months after my high school graduation.
4. I am 23 years old and pursuing a Bachelor's of Business Administration in Accounting from Whitworth University.
5. I am the recipient of the Act Six Scholarship, a full-tuition scholarship from the Northwest Leadership Foundation.
6. I work as a Cultural Events Coordinator at Whitworth University.
7. I also co-founded and volunteer at Spokane Dream Project, an organization advocating for undocumented students in the Spokane community.
8. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in October 2016.
9. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
10. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7<sup>th</sup> day of May, 2018 in Spokane, WA.



Signature

Moses Hamau Chege  
Printed Name



# APPENDIX A

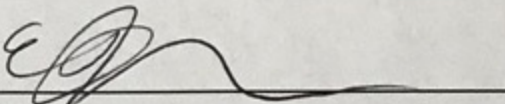
## TAB 20



3. I graduated from high school in Houston, Texas, where I participated in the National Honor Society and graduated as valedictorian.
4. I am 23 years old and pursuing a Bachelor of Arts in Social Studies from Harvard University.
5. I am currently taking a one-year leave of absence from Harvard to work at the National Korean American Service & Education Consortium as an Immigrant Rights Fellow in Chicago.
6. At Harvard University, I volunteer as Senior Advisor to the Asian American Women's Association. I am also a Leader at the First Year Urban Program, a mentorship program designed to orient freshmen students at Harvard who are interested in public interest careers.
7. I received the Harvard Foundation Award for Race Relations my sophomore and junior years as a student at Harvard University.
8. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and October 2016.
9. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
10. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of May, 2018 in Chicago, Illinois.

  
\_\_\_\_\_  
Signature

Hyo-won Jeon  
\_\_\_\_\_  
Printed Name

# APPENDIX A

## TAB 21

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYO-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

## DECLARATION OF ELIZABETH DIAZ

My name is ELIZABETH DIAZ. I am over the age of 18 and fully competent to make this declaration.

1. I live in McAllen, Texas.
2. I was born in Mexico and was brought by my parents to the United States when I was 6 years old.

3. I graduated from Juarez-Lincoln High School.
4. I am 23 years old and earned an Associates Degree in Early Education from South Texas College. At South Texas College, I volunteered with Mothers Against Drunk Driving and with Valley Scholars, a community service organization.
5. I also have a certified nursing assistance certification and physical therapy technician certification from the New Start School.
6. I am married and work as a relocation manager for a security company in McAllen, Texas.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and 2017.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7 day of May, 2018 in McAllen, Texas.

A handwritten signature in black ink, appearing to be "Elizabeth Diaz", written over a horizontal line.

\_\_\_\_\_  
Signature

**Elizabeth Diaz**

\_\_\_\_\_  
Printed Name



# APPENDIX A

## TAB 22

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYO-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

### DECLARATION OF MARIA DIAZ

My name is MARIA DIAZ. I am over the age of 18 and fully competent to make this declaration.

1. I live in Mission, Texas
2. I was born in Mexico and was brought by my parents to the United States when I was 12 years old.

3. I graduated from the South Texas High School for Health Professions.
4. I am 29 years old and earned a nursing degree from The University of Texas Rio Grande Valley.
5. I work as a nurse at a hospital in Edinburgh, Texas.
6. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014, 2016, and 2018.
7. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
8. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 07 day of May, 2018 in Mission TX

  
Signature

Maria Diaz Sanchez  
Printed Name

# APPENDIX A

## TAB 23

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

Case No. 1:18-CV-68

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, MARIA ROCHA,  
JOSE MAGAÑA-SALGADO,  
NANCI J. PALACIOS GODINEZ,  
ELLY MARISOL ESTRADA, KARINA  
RUIZ DE DIAZ, CARLOS AGUILAR  
GONZALEZ, KARLA LOPEZ, LUIS A.  
RAFAEL, DARWIN VELASQUEZ,  
JIN PARK, OSCAR ALVAREZ,  
NANCY ADOSSI, DENISE ROMERO,  
PRATISHTHA KHANNA, JUNG WOO  
KIM, ANGEL SILVA, MOSES KAMAU  
CHEGE, HYU-WON JEON, ELIZABETH  
DIAZ, MARIA DIAZ, and BLANCA  
GONZALEZ.

**Proposed Defendant-Intervenors.**

## DECLARATION OF BLANCA GONZALEZ

My name is BLANCA GONZALEZ. I am over the age of 18 and fully competent to make this declaration.

1. I live in Mission, Texas.
2. I was born in Mexico and was brought by my parents to the United States when I was 9 years old.

3. I graduated from Juarez-Lincoln High School in La Joya, Texas where I participated in the student council.
4. I am 27 years old and earned an Associated Degree in Criminal Justice and Education from South Texas College. I participated in the student criminal justice society.
5. I work as an assistant manager at a restaurant in Palmhurst, Texas.
6. I am married and have a 6 year old daughter who is a U.S. citizen.
7. I am a recipient of deferred action through the initiative known as Deferred Action for Childhood Arrivals (DACA). Since initially receiving DACA, I have successfully renewed my deferred action in 2014 and 2017.
8. I have lived in the United States for most of my life and I wish to remain in the United States. Receiving deferred action is critical to my ability to live and work in the United States and losing deferred action would impose a great hardship on me.
9. I want to participate in this case in order to defend DACA for myself and others in my situation.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 8 day of May, 2018 in Mission, Texas.



Signature

Blanca Gonzalez

Printed Name