

JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
COVINGTON & BURLING LLP
One Front Street, 35th Floor
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091
Email: jdavidson@cov.com,
abersin@cov.com
*Attorneys for Plaintiffs The Regents of the
University of California and Janet Napolitano, in
her official capacity as President of the
University of California*

THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: (213) 229-7000
Facsimile: (213) 229-7520
Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
jgabriel@gibsondunn.com
*Attorneys for Plaintiffs Dulce Garcia, Miriam
Gonzalez Avila, Saul Jimenez Suarez, Viridiana
Chabolla Mendoza, Norma Ramirez, and Jirayut
Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & MCCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
*Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
in her official capacity as President of the
University of California,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
official capacity as Acting Secretary of the
Department of Homeland Security,

Defendants.

CASE NO. 17-CV-05211-WHA

DECLARATION OF DELLARA GORJIAN

STATE OF CALIFORNIA, STATE OF
MAINE, STATE OF MARYLAND, and
STATE OF MINNESOTA,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security, and the UNITED
STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, ELAINE C.
DUKE, in her official capacity, and the
UNITED STATES OF AMERICA,

Defendants.

CASE NO. 17-CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ
AVILA, SAUL JIMENEZ SUAREZ,
VIRIDIANA CHABOLLA MENDOZA,
NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

Plaintiffs,

v.

UNITED STATES OF AMERICA, DONALD
J. TRUMP, in his official capacity as President
of the United States, U.S. DEPARTMENT OF
HOMELAND SECURITY, and ELAINE
DUKE, in her official capacity as Acting
Secretary of Homeland Security,

Defendants.

CASE NO. 17-CV-05380-WHA

COUNTY OF SANTA CLARA and
SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

CASE NO. 17-CV-05813-WHA

1 I, DELLARA GORJIAN, DECLARE:

2 1. I am an immigrant to the United States. I was born in Canada and I am a Deferred Action
3 for Childhood Arrivals (“DACA”) recipient. The matters set forth herein are true and correct of my own
4 personal knowledge and, if called as a witness, I could and would testify competently thereto.

5 2. I came to the United States at the age of five, in 1999. I am now 23 years old and a first
6 year law student at University of California, Los Angeles (“UCLA”).

7 3. I grew up in Irvine, California and attended school there from kindergarten through high
8 school. My parents were undocumented immigrants when I was growing up. My mom worked as a
9 hairdresser and my dad as a construction worker during my childhood. My parents have worked hard all
10 their lives and sacrificed just to support my sister and me. They have no assets or savings to speak of. I
11 have seen firsthand how much they have sacrificed in order to provide us with the opportunities that
12 exist in America.

13 4. As a child, I remember being concerned about my immigration status and whether it
14 would prevent me from pursuing certain dreams. I wanted to know if my lack of U.S. citizenship would
15 prevent me from doing some of the activities I really enjoyed, like auditioning for a certain acting role or
16 entering a singing competition. As I got older, I recall worrying about whether I could do the basic
17 things my friends were doing as teenagers, like applying for a driver’s license or getting a summer job.
18 But I was not allowed to participate in family conversations between my parents and older sister about
19 my immigration status and what it meant. My parents would always change the subject or promise to
20 talk about whether I could do all those things “soon.”

21 5. As a high school student, I was uncertain about the opportunities that were available to
22 me as an undocumented person. I did not know whether college was an option. I assumed that high
23 school would be the end of my academic career, so I did not apply myself academically and I graduated
24 with a 2.95 GPA.

25 6. Eventually, I ended up enrolling in Irvine Valley College, a community college, in the
26 fall of 2012. I learned about the DACA policy around the same time. I was instantly intrigued. DACA
27 status appealed to me as a way that I could work to support myself and lessen the financial burden on
28 my parents, and I was also excited about being able to get a driver’s license. I was motivated by these

1 ideas of independence and being able to help my family, so I applied for DACA status. I was initially
2 granted DACA status, including a work authorization, in October 2012. I have since renewed twice, in
3 the fall of 2014 and again in the fall of 2016.

4 7. For me, the most significant impact of obtaining DACA has been the academic doors it
5 opened. It not only created previously unavailable opportunities for me to continue in school, it also
6 gave me the motivation to apply myself and succeed in ways I had never thought possible before. When
7 I was growing up, I thought I wanted to be a singer. It seemed like a path that was available to me, in
8 which my undocumented status might not be as big of a barrier to success. When I received DACA, I
9 had a newfound drive to go further in school and to support my family.

10 8. One of my first classes after getting DACA status was a communications and speech
11 class. I committed myself to that class in a way I never would have before I received DACA. The
12 teacher was the head of the speech and debate team and was impressed with my speaking and
13 presentation abilities. He recruited me to join the speech and debate team. I was named captain during
14 my freshman year. I led the team to two consecutive state championships and two national
15 championships. I also won a top individual speaker award at a national-level Model United Nations
16 conference.

17 9. All in all, my first years after receiving DACA status were a transformative time for me. I
18 had debating success. My grades were excellent. I learned what could happen if I applied myself
19 academically. I suddenly had the encouragement of my professors, who encouraged me to see myself as
20 someone who could be a lawyer. This type of profession was never something I had considered to be
21 available to me growing up as an undocumented person.

22 10. With newfound academic aspirations, I began considering schools to transfer to. I wanted
23 to obtain a bachelor's degree from a 4-year college to continue my journey of becoming a lawyer. As a
24 DACA status student, I could not obtain federal loans, so I limited my search to affordable local schools.
25 I decided to attend California State University, Long Beach ("CSULB") so that I could minimize the
26 cost of my education and stay close to family. It also seemed like a school where I would be welcomed
27 as a DACA status student. I enrolled in a Political Science program at CSULB.

1 11. Upper-level courses intimidated me at first. I was the first person in my immediate family
2 to go to a 4-year college. I lacked a network of people who could tell me how to navigate this academic
3 environment and the rigors of upper-level political science courses. Nevertheless, I succeeded. The
4 encouragement of professors and my 4.0 GPA after my first term at CSULB made it clear to me that I
5 was on the right path. I was sure I could make it into a good law school if I kept trying. Without my
6 DACA status, I would not have aspired to attend law school.

7 12. My DACA work authorization allowed me to work and provide for myself throughout
8 college. In community college, I worked as a bank teller and then later as an executive assistant at a
9 manufacturing company. At CSULB, with my eyes set on law school, I used my DACA work
10 authorization to obtain a position as a legal assistant at a law firm in Century City. I even worked full
11 time during all of my last semester. I graduated with my B.A. in Political Science from CSULB in 2016.

12 13. My parents became United States citizens just recently, in April 2015. Although they
13 tried to get lawful permanent resident status for me before that (while they were still lawful permanent
14 residents themselves), I turned 21 while the application was pending. I understand that this changed my
15 preference category, such that it will likely be many years before I could even file a full application to
16 become a lawful permanent resident. After that, it would take even more time for the application to be
17 considered. The timeframe is too long and uncertain for me to depend on it.

18 14. In 2016, I applied to law school. I was admitted to several schools. When it came down to
19 it, I wanted to stay close to my family and I felt safe in California. I chose UCLA and started just this
20 fall as a first year law student. Law school is incredibly important to me. I want to prove that I can do
21 what I never thought was academically possible before, and I want to advocate for others someday. I
22 also want to be able to help my parents financially as they grow older and law school seemed like a
23 reliable way to achieve that.

24 15. I would like to work at a large law firm when I graduate, and I know many UCLA law
25 school graduates do that. With the rescission of the DACA policy in September 2017, the promising
26 career paths law school was supposed to open the door to seem suddenly closed off again. My current
27 DACA status will expire in October 2018. This is just weeks into my second year of law school, and
28 right around the time when I will be trying to secure a second year summer associate position at a law

1 firm. I am concerned about how the DACA policy rescission will affect my ability to secure a summer
2 associate position. I know securing a second-year summer associate position is a crucial step to securing
3 a first-year associate position at a law firm, which is important to my long-term plan of becoming a
4 lawyer.

5 16. The expiration of my DACA status and employment authorization will make it
6 impossible for me to work as a law firm associate in the U.S. as I had planned. If I am able to graduate
7 without DACA status, I expect to have about \$90,000 in private debt. This is in part because I am not
8 eligible for federal financial aid as a DACA student. I never would have saddled myself with tens of
9 thousands of dollars in student loans like this if I knew that my DACA status, and with it my
10 employment status, would end. I went to law school expecting that a large law firm job and the
11 significant salary that comes with it were real possibilities. Now, I will not be able to earn a salary that is
12 commensurate with my education level and the significant debt I will have incurred from law school. I
13 am worried that my credit history will be destroyed because I will not be able to pay this debt.

14 17. At the moment I am ten weeks into my first term of law school. Between reading for
15 class and writing my graded memo, I have plenty to worry about aside from the looming and unexpected
16 expiration of my DACA status. I have renewed my DACA status multiple times in the past without any
17 issues, and I thought I would be able to do so again. I am trying to block the potential loss of my DACA
18 status out of my mind and focus on school as best as I can. I want to make sure that I get good grades so
19 that, if I can keep my DACA status, I will still have the same opportunities available to me after law
20 school that I expected when I decided to attend. I am trying not to let the potential loss of my DACA
21 status derail everything that I—and my family—worked so hard for, but it is a very difficult time for me.
22 I am scared that without DACA my future is no longer as bright and certain as I had hoped and planned
23 for.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is true
25 and correct.

26 Executed on October 28, 2017 in Los Angeles, California.

27 
28 DELLARA GORJIAN