

EXHIBIT 83

~~FILED UNDER SEAL~~

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

)	
ABDIQAFAR WAGAFE, et al., on)	
behalf of themselves and others)	No. 17-cv-00094 RAJ
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
DONALD TRUMP, President of the)	
United States, et al.,)	
)	
Defendants.)	

** CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER **
VIDEOTAPED DEPOSITION
of
NADIA R. DAUD

OCTOBER 8, 2020

MAGNA LEGAL SERVICES
(866) 624-6221
www.MagnaLS.com
File No. 641652

REPORTED REMOTELY BY: Karen M. Grant, WA CCR No. 2155



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APPEARANCES

(All parties appearing remotely via Zoom videoconference)

For the Plaintiffs:

PAIGE WHIDBEE
NICHOLAS P. GELLERT
Perkins Coie
1201 Third Avenue, Suite 4900
Seattle, Washington 98101
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For the Defendants:

VICTORIA BRAGA
U.S. DEPARTMENT OF JUSTICE
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044
202.616.5573
Victoria.M.Braga@usdoj.gov

Also Present:

Caitlin Miller - U.S. CIS and U.S. DHS
Matt Adams - Northwest Immigrant Rights
Project
Jessica Schau Nelson - U.S. CIS
Drew Brinkman - U.S. DOJ
Leon B. Taranto - U.S. DOJ
Brendon Moore

Videographer:

Daniel Katz - Magna Legal Services

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EXAMINATION INDEX

COUNSEL:	PAGE:
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Examination by Ms. Braga.	167

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EXHIBIT INDEX

NO:	MARKED:	DESCRIPTION:
1	31	Screen shots of training materials on Cultural Awareness; 68 pages
2	53	Defendants' Amended Fifth Set of Supplemental Initial Disclosures, dated August 20, 2020; 15 pages
3	98	Executive Order Protecting the Nation from Foreign Terrorist Entry into The United States, issued March 6, 2017; 11 pages
4	111	DEF-00420705 - 420718: [REDACTED]
5	111	DEF-00420560 - 420561: Email chain ending March 6, 2017, from Nadia Daud to Katherine Hess-Yoder
6	119	DEF-00425660 - 425661: Information Memorandum, subject: K-1 Social Media Pilot [REDACTED]

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EXHIBIT INDEX (Continuing)

NO: MARKED: DESCRIPTION:

7	139	Expert Report of Yliana Johansen-Mendez dated June 29, 2020; 67 pages
8	139	Expert Report of Jay Gairson dated July 1, 2020; 188 pages
9	140	Expert Report of Thomas K. Ragland dated June 30, 2020; 63 pages
10	156	Expert Report of Narges Bajoghli dated February 28, 2020; 36 pages
11	157	Expert Report of Marc Sageman dated June 29, 2020, 47 pages
12	158	Expert Declaration of Nermeen Arastu dated July 1, 2020; 162 pages

1 BE IT REMEMBERED that on Thursday, October 8,
2 2020, at 8:12 a.m., before Karen M. Grant, CCR 2155,
3 appeared Nadia R. Daud, the witness herein;

4 WHEREUPON, the following proceedings were had,
5 to wit:

6 --oOo--

7

8 VIDEOGRAPHER: We are now on the record. This
9 begins Video 1 in the deposition of Nadia R. Daud in the
10 matter of "Abdiqafar Wagafe, et al., vs. Donald Trump,
11 President of the United States, et al.," in the United
12 States District Court, Western District of Washington at
13 Seattle.

14 Today is Thursday, October 8th, 2020. Time is
15 8:12 a.m. This deposition is being taken remotely at the
16 request of Perkins Coie, LLP.

17 The videographer is Daniel Katz, the court
18 reporter is Karen Grant, both of Magna Legal Services. All
19 counsel and parties present will be noted on the
20 stenographic record.

21 Will the court reporter please swear in the
22 witness.

23 ///

24 ///

25 ///

1 NADIA R. DAUD,
2 witness herein, having been first duly sworn on oath,
3 was examined and testified as follows:
4

5 EXAMINATION

6 BY MS. WHIDBEE:

7 Q. Good morning. My name is Paige Whidbee, and I
8 represent the plaintiff. Thank you for taking the time to
9 meet with us today.

10 Have you ever been deposed before?

11 A. No.

12 Q. Okay. So just to start, I wanted to go over some
13 general instructions for the deposition today.

14 First off, the court reporter is writing down
15 everything that we're saying today, so it's important that
16 we try to avoid talking over each other. So I'll do my best
17 to wait until you're done answering a question to start
18 asking my next question, and in return I'll ask that you
19 please wait until I'm done asking my question to give your
20 answer. Does that sound fair?

21 A. Yes.

22 Q. Great.

23 And for the same reason, it's really important
24 that we give our answers verbally. So instead of nodding
25 for "Yes" or shaking your head for "No," just say "Yes" or

1 [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
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STATE OF WASHINGTON)
) ss
COUNTY OF PIERCE)

I, the undersigned certified court reporter, hereby certify that the foregoing deposition of NADIA R. DAUD was taken before me on OCTOBER 8, 2020, and thereafter transcribed under my direction; that the transcript of the deposition contains the full, true, and complete testimony of said witness, including all questions, answers, objections, motions, and exceptions of counsel;

That the witness, before examination, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth, and that the witness RESERVED the right of signature;

That I am neither attorney for, nor a relative or employee of, any of the parties to the action; further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially interested in the said action or the outcome thereof;

IN WITNESS WHEREOF, I have hereunto set my signature this 16th day of October, 2020.

KAREN M. GRANT
Certified Court Reporter No. 2155
(Certification expires 04/19/2021)

1 ACKNOWLEDGMENT OF DEPONENT

2

3 I, Nadia Daud, do
4 hereby certify that I have read the
5 foregoing pages, 1 - PGS, and that the
6 same is a correct transcription of the
7 answers given by me to the questions
8 therein propounded, except for the
9 corrections or changes in form or
10 substance, if any, noted in the attached
11 Errata Sheet.

7

8 W. J. [Signature] 11/23/2020
9 WITNESS NAME DATE

9

10

11 Subscribed and sworn
12 to before me this
13 _____ day of _____, 20 ____.

12

13 My commission expires: _____

13

14

15 _____
16 Notary Public

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