

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ABDIQAFAR WAGAFE, *et al.*, on behalf
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the
United States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

**DECLARATION OF NICHOLAS
GELLERT IN SUPPORT OF
PLAINTIFFS' RESPONSE TO MOTION
FOR LEAVE TO TAKE ADDITIONAL
DEPOSITIONS**

**NOTE ON MOTION CALENDAR:
October 2, 2020**

I, Nicholas Gellert, hereby declare:

1. I have personal knowledge of the facts stated below and am competent to testify regarding the same. I am one of the attorneys for Plaintiffs in this matter.

2. Attached hereto as Exhibit A is a true and correct copy of a string of email communications between counsel for the parties extending from July 15 to August 12, 2020, from which we have redacted information potentially requiring redaction by protective order in consultation with counsel for Defendants.

3. Attached hereto as Exhibit B is a true and correct copy of a string of email communications between counsel for the parties extending from July 17 to August 2, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of a portion of Plaintiffs' Second Supplemental Initial Disclosures, served on Defendants on November 29, 2019.

