

**Stephen Manning** (SBN 013373)  
stephen@innovationlawlab.org  
**Nadia Dahab** (SBN 125630)  
nadia@innovationlawlab.org  
INNOVATION LAW LAB  
333 SW Fifth Avenue #200  
Portland, OR 97204  
Telephone: +1 503 241-0035  
Facsimile: +1 503 241-7733

*Attorneys for Plaintiffs*

**Karen C. Tumlin** (admitted *pro hac vice*)  
karen.tumlin@justiceactioncenter.org  
**Esther H. Sung** (admitted *pro hac vice*)  
esther.sung@justiceactioncenter.org  
JUSTICE ACTION CENTER  
P.O. Box 27280  
Los Angeles, CA 90027  
Telephone: +1 323 316-0944

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

JOHN DOE #1; JUAN RAMON MORALES;  
JANE DOE #2; JANE DOE #3; IRIS  
ANGELINA CASTRO; BLAKE DOE;  
BRENDA VILLARRUEL; and LATINO  
NETWORK,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; KEVIN MCALLENAN, in his  
official capacity as Acting Secretary of the  
Department of Homeland Security; U.S.  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; ALEX M. AZAR II, in  
his official capacity as Secretary of the  
Department of Health and Human Services;  
U.S. DEPARTMENT OF STATE;  
MICHAEL POMPEO, in his official capacity  
as Secretary of State; and UNITED STATES  
OF AMERICA,

Defendants.

Case No.: 3:19-cv-01743-SB

**DECLARATION OF BRENDA  
VILLARRUEL IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION**

**Declaration of Brenda Villarruel**

I, Brenda Aniza Villarruel, upon my personal knowledge, hereby declare as follows:

1. I am a United States citizen by birth.

2. I currently live in Chicago, Illinois with my United States citizen biological son, and my United States citizen parents. I work part time as a medical assistant at [REDACTED] [REDACTED]. I earned my Medical Assistant Certificate on August 18, 2012. I have worked for [REDACTED] since 2013.

3. My husband is a professional tattoo artist. We opened [REDACTED] [REDACTED], in East Chicago, Indiana in June 2016. I work at the parlor to keep the business up and running in his absence. I started piercing professionally in July 2017 and tattooing in July 2018. I presently work at [REDACTED] with one (1) other artist trying to keep doors open awaiting my husband's return.

4. I do not have employer-provided health insurance. I do not have a general doctor. I use the services of Aunt Martha's Health & Wellness Program for reproductive health. They offer sliding scale clinic services based on income. Every time I go to the clinic, I pay only \$20.

5. I have sponsored an immigrant visa application for my husband, Gabino Soriano Castellanos, so that I can reunite with him here.

6. My husband is a national of Mexico, and currently resides in Mexico City, Mexico. I married my husband in 2016. My husband has been in Mexico since March 9, 2018.

7. I applied for my husband to come to the United States on or around July 1, 2016. The I-130 petition was approved on or around September 6, 2016.

8. Since then, my husband attended an initial IV interview at Ciudad Juarez on March 27, 2018. His visa was refused and we filed an I-601, Application for Waiver of Grounds of Inadmissibility on December 17, 2018. It was approved on August 20, 2019 and my husband was scheduled to attend his IV interview on November 5, 2019 at 8:45 a.m.

9. However, after we considered the Proclamation and researched all the approved health insurance plans, we requested to postpone the interview. Every approved plan is either not available to my husband and I or unaffordable and would remain so due to our family's current financial situation. For example, we cannot afford visitor insurance or short-term disability plans and we are not eligible for other plans such as Medicare.

10. On or about October 30, 2019 my husband was told via phone that he could cancel his interview or reschedule his interview, however, there were not available future interview dates to reschedule the interview and he would have to call back if he wanted to reschedule. We are hoping that he will be able to reschedule his interview in the next few months. I have already been living apart from my husband for one (1) year and nine (9) months, and the separation has been exceptionally painful. I can only communicate with my husband through phone on a limited basis due to work and family obligations. As I mentioned my husband is a professional tattoo artist. He is the "main attraction" as an artist. He is known for his black and grey and traditional tattooing styles and hold a certificate in drawing from The School of the Art Institute of Chicago. Although some of our customers have gone to other artists due to the long wait for his return, we still have approximately 100 confirmed customers waiting to be specifically tattooed by my husband. I do not know how much longer I will be able to keep the business going.

11. When I learned that our separation will be prolonged indefinitely, I felt absolutely devastated and that we are finally going to be wiped out financially. I cannot think we can keep a tattoo business open without the star tattoo artist.

12. My son, [REDACTED] Gabino's stepson is extremely depressed. Gabino has been the only father figure [REDACTED] has ever had. [REDACTED] was only four (4) years old when Gabino and I met. He asks me constantly when Gabino will be back. This additional delay has left him feeling hopeless and in despair.

13. I am American and my parents are originally from Mexico. My mother became a United States citizen before me or my three (3) siblings were born. My dad became a lawful permanent resident on the day I was born, [REDACTED]. When I was in high school, I helped my dad study for his naturalization test.

14. I am willing to serve as a class representative on behalf of those who are similarly situated to me and cannot have family members join them in the United States because of the current refugee restrictions.

15. I know that if the class is certified I will be representing more than just myself in this case. I have spoken with the lawyers who represent me about what being a class representative means. I want to help everyone in my situation because we are all suffering due to the unfair restrictions imposed by this Proclamation.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed at Chicago, Illinois on November 6, 2019.

Brenda Villaruel  
Brenda Villaruel

Sworn before me this 6th day of November 2019

Kiki Maria Mosley  
Notary Public  
Commission Expires: 07/30/2022

