

Exhibit B

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MAZDAK POURABDOLLAH TOOTKABONI
and ARGHAVAN LOUHGHALAM,

Plaintiff-Petitioners,

FATEMEH YAGHOUBI MOGHADAM,
BABAK YAGHOUBI MOGHADAM,
ALI SANIE, ZAHRASADAT MIRRAZI
RENANI, LEILY AMIRSARDARY, and
OXFAM AMERICA, INC.

Plaintiffs,

v.

No.17-cv-10154-NMG

DONALD TRUMP, President of the United
States; U.S. DEPARTMENT OF HOMELAND
SECURITY (“DHS”); U.S. CUSTOMS AND
BORDER PROTECTION (“CBP”); JOHN
KELLY, Secretary of DHS; KEVIN K.
MCALEENAN, Acting Commissioner of CBP;
and WILLIAM MOHALLEY, Boston Field
Director, CBP,

Respondents-Defendants.

AFFIDAVIT OF MAZDAK POURABDOLLAH TOOTKABONI

Mazdak Pourabdollah Tootkaboni, hereby affirms,

1. I am one of the Petitioner-Plaintiffs in this case.
2. My wife Petitioner-Plaintiff Arghavan Louhghalam and I are Iranian nationals, we are Muslim, and we both are lawful permanent residents of the United States.
3. My wife and I are also professors on the faculty of the University of Massachusetts-Dartmouth. I am an associate professor in the UMass-Dartmouth College of Engineering. I obtained a Ph.D. in 2009 in civil engineering, specializing

in Structural Mechanics, from Johns Hopkins University and have been on the faculty at UMass-Dartmouth since 2010. My research is cross-disciplinary and focuses on developing techniques that help structural mechanics community move towards more reliable, resource-efficient and resilient solutions for civil infrastructures. I am a recipient of the NSF early CAREER award in 2014, a recipient of University of Massachusetts President's Science and Technology award for 2014-2015, and a recipient of UMass-Dartmouth Chancellor's Sponsored Research Recognition award in 2015. I am an associate member of American Society of Civil Engineers (ASCE) and a member of Engineering Mechanics Institute (EMI).

4. In January, 2017, my wife and I traveled to Marseille, France to attend a week-long workshop on Mechanics of Porous Materials (e.g. cement, concrete, soil) organized through the AMU (Aix-Marseille University)-MIT-CNRS joined lab with the support of MIT Energy Initiative.

5. We returned, flying in to Logan Airport on January 28, 2017 from Paris Charles de Gaulle Airport. We were detained by Customs and Border Patrol officers for nearly four hours, for no apparent reason other than the President's Executive Order affecting immigrants and refugees, the details of which we learned about after we were released. We were asked why we were in France and what our occupations were in US.

6. I am greatly concerned about the Executive Order. As a professor of engineering, I frequently attend meetings and conferences, and share research and ideas with others from my field around the world, including other faculty, students,

and researchers. Intellectual inquiry, debate, and discussion internationally are critical to the development of my research. Meeting with others in person is critical to the thorough exchange of ideas and is entirely different from communicating in other ways. If the court's order staying the Executive Order does not remain in effect, I fear that it will be applied to me again and I cannot travel with the fear that I could not return.

7. I am also worried that if the Executive Order were applied to me again, it would make it impossible for me to leave the United States to visit my mother in Iran who is seventy years old and suffers from depression. Both she and I rely on my regular visits to see her. I would not be able to visit her if I feared being unable to return to my wife, my life, my work, and my home in the United States. Being separated from close family is difficult enough on a daily basis but being prevented from visiting for this reason is beyond distressing.

8. While I understand the Counsel to the President has issued a memo saying the EO now does not apply to lawful permanent residents like me, I am still afraid to travel because I have seen what people, caught off-guard and stranded in the middle of fast-paced changes and quick shifts in laws and policies, have been through over the past few days.

Signed under the penalty of perjury this 2nd day of February, 2017.



Mazdak Pourabdollah Tootkaboni