

Exhibit C

**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 BABAK YAGHOUBI MOGHADAM

Babak Yaghoubi Moghadam hereby affirms,

1. I am one of the Plaintiffs in this case.
2. I am an Iranian national, I am Muslim, and a lawful permanent resident of the United States.
3. I have a Ph.D. in mechanical engineering from the University of Washington, an M.S. degree in mechanical engineering from Ferdowsi University, and a B.S. degree in mechanical engineering from Iran University of Science & Technology.

4. I obtained my permanent resident status through the National Interest Waiver program based on the importance of my knowledge, skills, and experience to the United States. I am currently employed as a senior engineer by Becton Dickinson, a global medical technology company, and my current work is making medical devices to treat diabetes patients. Previously, I worked on developing ten-to-fifteen minute diagnostic tests to be used in doctors' offices, saving patients the need to go to hospitals for tests for infectious diseases like HIV.

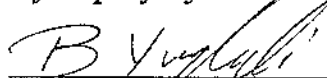
5. I have close family members living in Iran, including my parents, my brother Behrouz, my grandmother, and aunts and uncles. Behrouz recently suffered a major heart attack and I had been planning to visit him and my other relatives in Iran or other nearby countries. Since I learned of the President's Executive Order preventing non-U.S. citizens from Iran from returning to the U.S., I have put all plans of international travel aside. I cannot take the risk of not being allowed to return to my home here in the United States, to my work, and to my fiancé and sister with whom I live.

6. In addition, my employer has advised all non-citizen employees from Iran and other affected countries not to travel abroad because of the Executive Order. International travel is very important to the development of my work and to advancement within my company. I work for a global company with offices in more than 10 countries around the world. We frequently work on projects in collaboration with our development teams abroad and I need to be able to travel to contribute to these activities and grow within the company.

7. I grew up in Iran where, like other young people, I lived under the country's conservative religious social restrictions. I experienced stress and uncertainty on a daily basis because the government can change the laws that severely affect people's lives without any notice. I have been living in the U.S. for the past seven years, where I felt secure and confident that if I work hard and contribute to my society, I will be able to achieve my goals and plan for my future. In the last two weeks however, with the Executive Order on immigration, every day I am expecting the U.S. government to take new actions that can jeopardize my life, career and loved ones, just because of the country in which I was born and my religion.

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 because I have seen the government quickly shift what it has been saying numerous times over the past week. I feel that the U.S. government could change its position at any time. I have no certainty that if I travel abroad, the government will allow me to return, especially in light of the singling out of people based on religion and national origin.

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



Babak Yaghoubi Moghadam