

# Exhibit D

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

MAZDAK POURABDOLLAH TOOTKABONI, and

ARGHAVAN LOUHGHALAM,

*Petitioners,*

v.

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

*Respondents.*

Civil Action No. 17-cv-10154

**DECLARATION OF ALI SANIE**

I, Ali Sanie, hereby declare as follows:

1. My name is Ali Sanie. I am an Iranian citizen and a Lawful Permanent Resident (“LPR”) of the United States. I reside in Quincy, MA. I have been a LPR since 2010. My sister, Sepideh Sanie, is a United States citizen and resides in Braintree, MA.
2. I am Muslim.
3. I work as a cashier at a grocery store in Braintree, MA. I work seven days a week and I developed serious neck issues as a result. I went to the Emergency Room because of the pain that I was in and I was told I may need neck surgery.
4. I want to see a doctor in Iran for any potential surgery because I know my old doctor there and I can have family and friends in Iran care for me after any surgery. My father resides in Iran.
5. I have been wanting to go back to Iran for a long time. I finally booked a trip to Iran for January 30, 2017. The pain in my neck had become unbearable. I had to travel at this

time to arrive in time to have any treatment for my severe neck pain before Persian or Iranian New Year on March 20, 2017 and to have time to recover afterwards before coming back to the United States.

6. I pre-paid three months of my rent and my employer arranged to have coverage for my job for three month for this trip. I saved up money and planned for a trip for two years to be able to make a trip back to Iran.
7. I purchased gifts for my family in Iran. I had scheduled an MRI, physical therapy and time for surgery if necessary in Iran. I cannot work until I have medical help because I am in so much pain and I choose to seek help with a doctor in Iran and with my father and friends in Iran to help me.
8. I was emotionally very upset when I had to abort my long-awaited trip to Iran just at the last minute. I was crying and now I am confused about what my future will hold.
9. I cannot go to work at my job because my replacement has been hired. I am afraid to travel to Iran at this time because I fears that, if I leave the United States, I will not be permitted to return to the United States.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 2, 2017.

  
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Ali Sanie