

Exhibit E

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

ARGHAVAN LOUHGHALAM and,
MAZDAK POURABDOLLAH TOOTKABONI
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,
Defendants.

AFFIDAVIT OF ZAHRASADAT MIRRAZI RENANI

I, Zahrasadat Mirrazi Renani, state under oath that:

1. I am an Iranian national with an F-1 student visa. I obtained that visa before moving to the United States in September 2016.
2. I reside in Amherst, Massachusetts.

3. I am completing my first year of a five-year doctoral program in linguistics at the University of Massachusetts Amherst, one of the most respected linguistics programs in the world. My academic focus is in syntax and semantics. I earned straight As in my first semester.

4. I am Muslim.

5. My parents, a teacher and a businessman, live in Iran. My only sibling, a younger brother, died just eight months ago of a stroke while mountain climbing.

6. I chose to study in America despite achieving the highest score of 3,000 students on the annual examination for admission into postgraduate linguistics programs in Iran. I promised, however, to visit my parents often.

7. I made my first visit to my parents on December 14, 2016. I spent my entire winter break with them, returning to the University of Massachusetts Amherst on January 21, 2017.

8. I had planned to visit my parents again in late March during Norooz, a time of New Year observance in Iranian culture, when families traditionally come together to reflect and celebrate. My parents and I are still reckoning with my brother's tragic death, so reuniting to comfort one another and our extended family is uniquely important this year. I had planned to leave for Iran on March 11, 2017, the day my spring break begins.

9. I also had planned to attend the West Coast Conference on Formal Linguistics in Calgary Canada, and to arrive there on April 27, 2017. This conference is among the most prestigious in my field of research. I already have researched, drafted and submitted an abstract for presentation at the conference, on "Double-Object Construction in the Persian Language." The opportunity to present to such an accomplished audience would be an invaluable step forward in my academic career.

10. I have been awarded full funding of my doctoral studies—worth over \$290,000—but that funding is conditioned upon my continued fulfillment of class requirements and the teaching and research responsibilities of an “Assistantship” which I hold at the University of Massachusetts Amherst.

11. Put simply, the January 27, 2016 Executive Order has put me in an unfair predicament: I must forfeit two invaluable opportunities for my family reunion and my professional growth; or I must forfeit the opportunity I have earned to pursue my doctorate in formal linguistics. As a consequence, I am refraining from any international travel. If I make either of my planned trips abroad, I am afraid I will not be able to return to the United States.

12. I have done nothing in my life which would cause me to pose any threat of terrorist activity. I have no criminal record in the United States or Iran.

Signed under the pains and penalties of perjury this 2nd day of February, 2017.

Zahrasadat Mirrazi Renani

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