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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CITY OF SAN JOSE, CALIFORNIA, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, et al.,

Defendants.

CASE NO. 5:20-cv-05167-LHK-RRC-EMC

DECLARATION OF ZERIHOUN YILMA IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Date: October 8, 2020, 2020
Time: 1:30 p.m.
Place: Courtroom 8, 4th Floor
Judge: Honorable Richard R. Clifton
Honorable Lucy H. Koh
Honorable Edward M. Chen

DECLARATION OF ZERIHOUN YILMA

I, Zerihoun Yilma, declare as follows:

1. I have personal knowledge of the facts set forth below and if called upon to testify, I could and would do so competently as follows:

2. I am the Board Chair of the Black Alliance for Just Immigration ("BAJI") and a Plaintiff in this action.

3. I currently reside in Los Angeles County, California, where I am registered to vote and regularly exercise my right to vote.

4. I understand that the exclusion of undocumented immigrants from the apportionment base will lead to an undercount of persons in the State of California relative to other states such that California is highly likely to lose a seat in Congress. California's loss of a seat in Congress would deprive me of my fair share of representation in the United States House of Representatives.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on August 27, 2020 in Los Angeles, California.

Zerihoun Yilma