EXHIBIT 83 FILED UNDER SEAL

	Page
UNITED STATES DI	
WESTERN DISTRICT	
AT SEAT	TLE
)
ABDIQAFAR WAGAFE, et al., on)
behalf of themselves and others) No. 17-cv-00094 RAJ
similarly situated,)
)
Plaintiffs,)
)
VS.)
)
DONALD TRUMP, President of the)
United States, et al.,)
)
Defendants.)
** CONFIDENTIAL - SUBJECT VIDEOTAPED DE of	POSITION
NADIA R.	
OCTOBER 8,	2020
OCTOBER 8,	
OCTOBER 8,	SERVICES
OCTOBER 8, MAGNA LEGAL (866) 624-	SERVICES 6221
OCTOBER 8,	SERVICES 6221 S.com



	Page 2
1	APPEARANCES
2	(All parties appearing remotely via Zoom videoconference)
3	
4	For the Plaintiffs:
_	PAIGE WHIDBEE
5	NICHOLAS P. GELLERT
	Perkins Coie
6	1201 Third Avenue, Suite 4900
	Seattle, Washington 98101
7	206.359.6231
	pwhidbee@perkinscoie.com
8	For the Defendants:
9	VICTORIA BRAGA
10	U.S. DEPARTMENT OF JUSTICE
10	P.O. Box 878, Ben Franklin Station
11	Washington, D.C. 20044
++	202.616.5573
12	Victoria.M.Braga@usdoj.gov
13	viscoliabragacasaoj.gov
	Also Present:
14	Caitlin Miller - U.S. CIS and U.S. DHS
	Matt Adams - Northwest Immigrant Rights
15	Project
	Jessica Schau Nelson - U.S. CIS
16	Drew Brinkman - U.S. DOJ
	Leon B. Taranto - U.S. DOJ
17	Brendon Moore
18	
	Videographer:
19	Daniel Katz - Magna Legal Services
20	
21	
22	
23	
24	
25	



			Page 3
1			EXAMINATION INDEX
2			
	COUNS	SEL:	PAGE:
3			
4			by Ms. Whidbee 6
4 5	Exami	nation i	oy Ms. Braga 167
6			
7			
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11			EXHIBIT INDEX
12	NO.		DEGGE DELON.
13	NO:	MARKED:	DESCRIPTION:
13	1	31	Screen shots of training materals on Cultural
14	_	0.1	Awareness; 68 pages
15	2	53	Defendants' Amended Fifth Set of Supplemental
			Initial Disclosures, dated August 20, 2020;
16			15 pages
17	3	98	Executive Order Protecting the Nation from
1.0			Foreign Terrorist Entry into The United
18	1	111	States, issued March 6, 2017; 11 pages
19	4	111	DEF-00420705 - 420718:
20			
	5	111	DEF-00420560 - 420561: Email chain ending
21			March 6, 2017, from Nadia Daud to Katherine
			Hess-Yoder
22			
	6	119	DEF-00425660 - 425661: Information
23			Memorandum, subject: K-1 Social Media Pilot
24			
25			
23			



			Page 4
1			EXHIBIT INDEX (Continuing)
2			(
	NO:	MARKED:	DESCRIPTION:
3			
	7	139	Expert Report of Yliana Johansen-Mendez dated
4			June 29, 2020; 67 pages
5	8	139	Expert Report of Jay Gairson dated July 1,
			2020; 188 pages
6			
	9	140	Expert Report of Thomas K. Ragland dated
7	1.0	156	June 30, 2020; 63 pages
8	10	156	Expert Report of Narges Bajoghli dated
9			February 28, 2020; 36 pages
	11	157	Expert Report of Marc Sageman dated June 29,
10		_0 .	2020, 47 pages
11	12	158	Expert Declaration of Nermeen Arastu dated
			July 1, 2020; 162 pages
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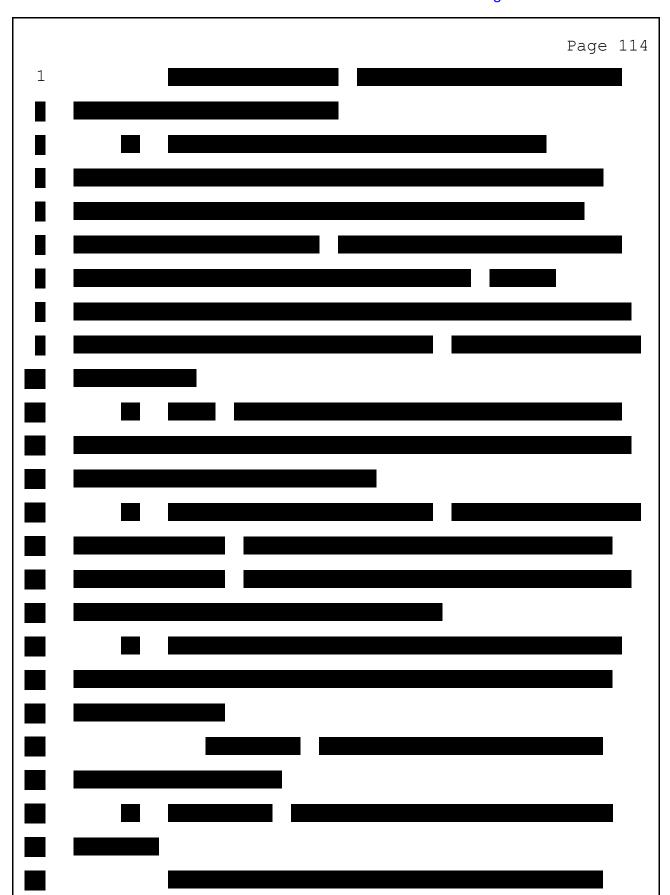


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Page 5
                   BE IT REMEMBERED that on Thursday, October 8,
 1
 2
          2020, at 8:12 a.m., before Karen M. Grant, CCR 2155,
          appeared Nadia R. Daud, the witness herein;
 3
                   WHEREUPON, the following proceedings were had,
 5
          to wit:
                               --000--
 7
                   VIDEOGRAPHER: We are now on the record. This
 8
 9
     begins Video 1 in the deposition of Nadia R. Daud in the
     matter of "Abdigafar Wagafe, et al., vs. Donald Trump,
10
     President of the United States, et al.," in the United
11
12
     States District Court, Western District of Washington at
     Seattle.
13
14
               Today is Thursday, October 8th, 2020. Time is
15
     8:12 a.m. This deposition is being taken remotely at the
     request of Perkins Coie, LLP.
16
17
               The videographer is Daniel Katz, the court
18
     reporter is Karen Grant, both of Magna Legal Services. All
     counsel and parties present will be noted on the
19
20
     stenographic record.
21
               Will the court reporter please swear in the
22
     witness.
23
    ///
    ///
24
25
     ///
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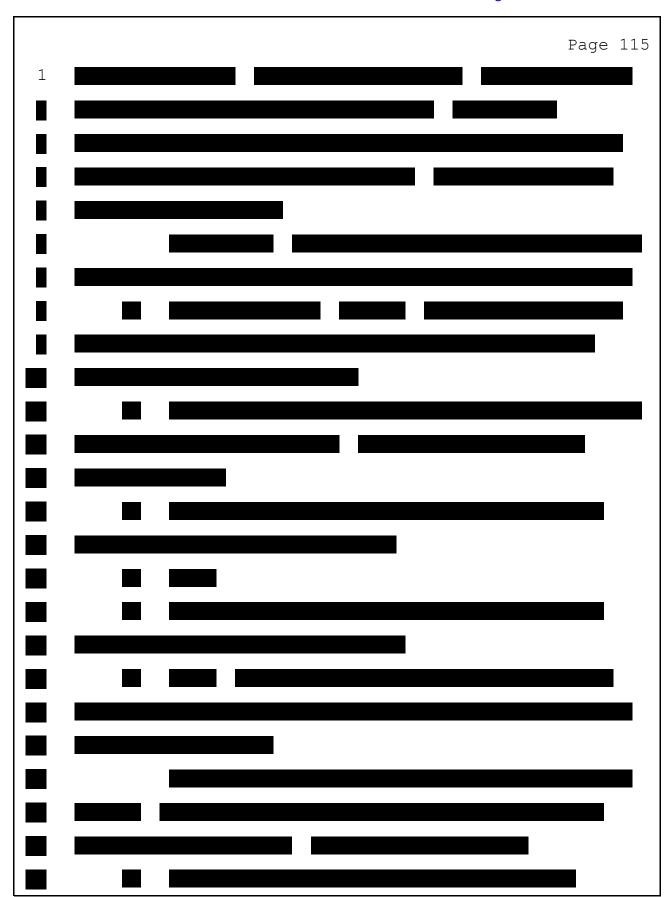


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1	NADIA R. DAUD,
2	witness herein, having been first duly sworn on oath,
3	was examined and testified as follows:
4	
5	EXAMINATION
6	BY MS. WHIDBEE:
7	Q. Good morning. My name is Paige Whidbee, and I
8	represent the plaintiff. Thank you for taking the time to
9	meet with us today.
10	Have you ever been deposed before?
11	A. No.
12	Q. Okay. So just to start, I wanted to go over some
13	general instructions for the deposition today.
14	First off, the court reporter is writing down
15	everything that we're saying today, so it's important that
16	we try to avoid talking over each other. So I'll do my best
17	to wait until you're done answering a question to start
18	asking my next question, and in return I'll ask that you
19	please wait until I'm done asking my question to give your
20	answer. Does that sound fair?
21	A. Yes.
22	Q. Great.
23	And for the same reason, it's really important
24	that we give our answers verbally. So instead of nodding
25	for "Yes" or shaking your head for "No," just say "Yes" or











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Page 171
 1
                        CERTIFICATE
 2
 3
     STATE OF WASHINGTON
                           ) ss
 4
     COUNTY OF PIERCE
                           )
 5
 6
               I, the undersigned certified court reporter,
     hereby certify that the foregoing deposition of NADIA R.
 7
     DAUD was taken before me on OCTOBER 8, 2020, and
     thereafter transcribed under my direction; that the
 8
     transcript of the deposition contains the full, true, and
     complete testimony of said witness, including all questions,
     answers, objections, motions, and exceptions of counsel;
 9
10
               That the witness, before examination, was by me
     duly sworn to testify the truth, the whole truth, and
11
     nothing but the truth, and that the witness RESERVED the
     right of signature;
12
               That I am neither attorney for, nor a relative or
     employee of, any of the parties to the action; further, that
13
     I am not a relative or employee of any attorney or counsel
     employed by the parties hereto, nor financially interested
14
     in the said action or the outcome thereof;
15
               IN WITNESS WHEREOF, I have hereunto set my
     signature this 16th day of October, 2020.
16
17
18
19
20
21
                               KAREN M. GRANT
                               Certified Court Reporter No. 2155
22
                               (Certification expires 04/19/2021)
23
24
25
```



1	ACKNOWLEDGMENT OF DEPONENT
2	
	I, Nadia Dand, do hereby certify that I have read the
4	foregoing pages, 1 - PGS, and that the same is a correct transcription of the
5	answers given by me to the questions therein propounded, except for the
6	corrections or changes in form or substance, if any, noted in the attached
7	Errata Sheet.
8	WITNESSNAME DATE
9	WITNESS NAME DATE
10	C1 '1 - 1 - 1 - 1
	Subscribed and sworn to before me this
12	day of, 20
13	My commission expires:
14	Notour, Duklin
15	Notary Public
16	
17	
18	
19	
20	
21	
22	

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