

Exhibit 2
SEALED

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

-----x

ABDIQAFAR WAGAFE, et al., on :
behalf of themselves and :
others similarly situated, :
Plaintiffs, :

-vs- : No.

DONALD TRUMP, President of the: 17-cv-00094 RAJ
United States, et al., :
Defendants. :

-----x

CONFIDENTIAL UNDER THE PROTECTIVE ORDER

30 (B) (6) VIDEOTAPED DEPOSITION OF USCIS

BY AND THROUGH KEVIN QUINN

Thursday, September 3, 2020

10:09 a.m.

Job No.: 623013

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Reported by: Tammy S. Newton

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1 (A brief recess was taken.)

2 VIDEOTAPE OPERATOR: 2:15 p.m., we're
3 on the record.

4 BY MS. PASQUARELLA:

5 Q Okay. Mr. Quinn, can you tell me what
6 immigration benefit forms are subject to CARRP?

7 A Broadly, all immigration benefit forms
8 are subject to CARRP.

9 Q And are they subject to all stages of
10 CARRP?

11 A Some benefit types might have a -- no,
12 might have an abbreviated form of the CARRP or
13 not have all of the steps prior to adjudication.

14 Q And what does it mean to have an
15 abbreviated form of CARRP?

16 A So this is outside of the I-485s and
17 N-400s.

18 Q Correct.

19 A Is that what you want to know about?

20 MR. KIPNIS: I think that's a question
21 for you, Jennie.

22 MS. PASQUARELLA: Yes.

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1 privileged information that he knows.

2 BY MS. PASQUARELLA:

3 Q Can you answer the question?

4 A Yes. I am aware of part of why one of
5 the named plaintiffs was subject to CARRP, and
6 the others I am not aware of the privileged
7 reasons for which they were -- may have been
8 subject to CARRP.

9 Q Okay. Can you tell me -- so it sounds
10 like you only are aware of what is not
11 privileged; is that right? What your lawyer is
12 saying is not privileged.

13 A Yes.

14 Q Can you tell me what it is that you
15 know that is -- forms the reason why one of the
16 named plaintiffs was subject to CARRP that your
17 counsel does not consider privileged?

18 A [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]

22 Q [REDACTED]

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1 Q [REDACTED]

2 [REDACTED]

3 A [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED].

12 Q [REDACTED]

13 A [REDACTED]

14 [REDACTED]

15 Q [REDACTED]

16 [REDACTED]

17 MR. KIPNIS: Objection to --

18 COURT REPORTER: What was that?

19 MR. KIPNIS: Objection to scope.

20 THE WITNESS: [REDACTED]

21 [REDACTED]

22 [REDACTED]

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1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 MR. KIPNIS: [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 BY MS. PASQUARELLA:

13 Q Okay. Let's talk about [REDACTED]

[REDACTED] Do

15 you have that information in front of you?

16 A I do.

17 Q Okay. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

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21

BY MS. PASQUARELLA:

22

Q [REDACTED]