

**DECLARATION OF SHAYANA KADIDAL**

I, Shayana Kadidal, an attorney admitted to the bars of the state of New York and this Court, hereby declare as follows:

1. Attached to this declaration are true and correct copies of the declarations of the individual named Plaintiffs in this matter under their proposed pseudonyms:

Exhibit 1: Declaration of Abdo Doe

Exhibit 2: Declaration of Hadeel Doe

Exhibit 3: Declaration of Faiz Doe

Exhibit 4: Declaration of Ebe Doe

Exhibit 5: Declaration of Sam Doe

Exhibit 6: Declaration of Ali Doe

Exhibit 7: Declaration of Fahad Doe

2. Plaintiffs can furnish the true identities of the Plaintiffs to the Court *ex parte* upon request.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 25, 2026  
New York, New York

  
\_\_\_\_\_  
Shayana Kadidal

**Exhibit 1: Declaration of Abdo Doe**

## DECLARATION OF ABDO DOE

I, Abdo Doe, declare as follows:

1. I was born in Yemen in 1960. I am 66 years old. I am a Yemeni citizen. I currently live in the Bronx, New York.
2. I came to the United States in September 1999 on a visitor visa. Initially, I had no plans to stay in the United States long-term. But I stayed a little longer to work and earn money to send home to my family. Then, not long after I arrived, my wife in Yemen died. We had no children. I had no wife or children to return to. I realized I could do more to support my parents by staying here and working than I could by going back. So I stayed. Over the years, I made several attempts to correct or adjust my status, but those efforts unfortunately did not work out.
3. I received TPS in 2017. TPS is my only protection from deportation. It is the only thing that allows me to work. It is also the reason I can afford to see a doctor. Without TPS, I lose my work authorization, my medical coverage, my ability to stay in this country. Having lived in the United States for nearly three decades, I have built my life here. And now I am terrified it could all be taken away.
4. I currently work part-time in a deli, which allows me to support myself. I follow the law. I pay my taxes. I have been here for nearly three decades, and I have never been in trouble.
5. I have multiple health problems. I have high cholesterol, stomach issues, and problems with my spine. I need regular medical care and daily medication. In Yemen, the healthcare system has been destroyed by war. Many hospitals have closed, medicine is scarce and unaffordable, and many doctors have fled the country. Finding a job there would also be extremely difficult. If I am sent back, I do not know how I would get the medical care I need to stay alive.
6. Since arriving to the United States, one of the hardest parts has been not being able to see my parents in Yemen. In 2023, after living in the United States for 24 years, I first went back to Yemen. Through my TPS, I applied for advance parole because my mother was critically ill. She had heart problems and her muscles had grown weak. I had not seen her in years, and I did not know how much time she had left. So, I went because I wanted to see my mother and take care of her for whatever time she left.
7. Before going to Yemen, I spent a brief period of time first in Egypt receiving medical treatment before I crossed into Yemen. I flew into Aden, which is controlled by the Yemeni government, and from there I traveled by land to Sana'a, where I am from and where my mother lives. Sana'a is controlled by the Houthis. I did it this way so that no one would know I had come from abroad. I did not want anyone to know I had been living in America.
8. I stayed in Yemen for three months. My mother died while I was there. I was with her at the end. That is the only good thing I can say about that trip, to get a chance to hold her

for the last time after 24 years of not being able to. The rest was a nightmare. I could not go outside. I did not know who I might encounter. The streets were full of armed men. There was conflict everywhere. I did not feel safe leaving my family's home. So, I stayed inside. I spent at least seventy-five percent of my time indoors. The only time I went out was to go to the market for necessities—food, basic supplies. I kept my head down. I tried not to be noticed and that is how I was able to survive in Yemen while I was there.

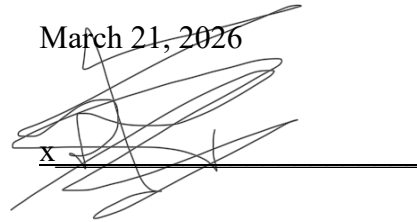
9. I cannot live there. It is not a place where a person can have a normal life. It is not a place where a 66-year-old man with health problems and financial or support system can survive. If I am forced to return to Yemen now, it will be even worse.
10. If the Houthis find out I have been living in the United States for twenty-seven years, they will detain me. They will question me. I have heard the stories. People return from abroad and they are taken. No one knows where the detention centers are. No one knows what happens inside. People disappear. I am terrified that if I go back, I will be one of them.
11. I have no one in Yemen. My mother is dead. My father died more than ten years ago. My wife is dead. I have no children in Yemen. Although I have some cousins who still live in Yemen, they would not be able to support me. I would essentially be alone, sick, with no family and no protection, in a country controlled by armed groups who see anyone connected to America as a spy or an enemy.
12. Being a plaintiff in this suit is risky for me. This case criticizes the Houthis' human rights record. If they find out I am a plaintiff, I do not know what would happen to my cousins who are still there. I do not know what would happen to me if I am ever forced to return.
13. I am also afraid that if we lose this case, and if ICE knows I participated, I will become a target. I will be a priority for enforcement. I am 66 years old. I have been here for twenty-seven years. I have followed the rules. I have done nothing wrong. And I am afraid that none of that will matter.
14. I do not want to die in Yemen. I want to live out my remaining years here, in the country that has been my home for twenty-seven years. I want to keep working. I want to keep taking my medication. I want to keep living.
15. I am willing to serve as a class representative for other Yemeni TPS holders who are facing the same fear I am facing. My lawyers have explained what that means. I understand that it means standing up for others who are in the same situation. I am willing to do that.
16. I respectfully ask to proceed in this case anonymously—to protect myself and to protect my cousins who remain in Yemen.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

This statement was prepared by my attorneys, who worked with a certified interpreter to accurately translate my statements from Arabic to English because I only speak Arabic. An interpreter read the full statement to me in Arabic, and I fully understand its contents and affirm that it is true and accurate to the best of my knowledge.

Executed in Bronx, NY

March 21, 2026

A handwritten signature in black ink is written over a horizontal line. The signature is somewhat scribbled and illegible. To the left of the horizontal line, there is a small 'x' mark.

**Exhibit 2: Declaration of Hadeel Doe**

## DECLARATION OF HADEEL DOE

I, Hadeel Doe, declare as follows:

1. I was born in Yemen in 1993. I am 33 years old. I am a Yemeni citizen, and I live in Detroit, Michigan.
2. I came to the United States on a B-2 visa in June 2023. I was granted TPS in December 2024. TPS is the only thing standing between me and deportation. It is the only reason I can work. It is the only reason I can stay here with my children. If it is taken from me, I lose everything—my status, my job, my right to be here—all at once. I think about this constantly. The fear never leaves me.
3. I recently finished my Master's degree in Educational Psychology. I earned that degree here, in this country, because I believed I could build a future for my children. If my TPS is terminated, that future I've imagined for my children and me is gone.
4. I have two children, both United States citizens. My daughter is 2. My son is 9. Everything I do is for them. And right now, their stability and safety depends entirely on my ability to stay in the United States.
5. I am also pregnant. My baby is due in mid-May 2026. I should be preparing for his arrival. Instead, I am terrified. I am terrified that I could lose my status while I am still carrying him. I am terrified of what it would mean to be forced to travel in my condition. I am terrified of what could happen to both of us.
6. And then there is his heart. My doctors have told me that my unborn son has a heart condition. He will need medical attention. He may need specialized care immediately after birth. I am already so afraid for my son but what makes it unbearable is knowing that the care he needs does not exist in Yemen. If I am forced to go back, my son could die. I need to say that plainly. My son could die because he cannot get the medical care that could save him.
7. I know what has happened to Yemen. I hear it from the news. I hear it from people I know. The war has destroyed the healthcare system. Hospitals have been bombed. Clinics have shut down. So many doctors have fled. The ones who remain do not have medicine, do not have equipment, do not have electricity. I have heard that many areas have no doctors at all. Even when a hospital is open, people cannot always reach it because of the fighting, the checkpoints, the danger on the roads.
8. I know that women and babies are dying in Yemen because they cannot get care during pregnancy and childbirth. Care that would be simple here does not exist there. If I am forced to return while pregnant, I do not know if I will be able to find a doctor to help me deliver. I do not know if I will survive. I do not know if my baby will survive. And even if we both survive the birth, my son's heart will need the kind of specialized care that Yemen cannot provide. There are no pediatric heart surgeons. There are no cardiac units for newborns. There is nothing.

9. I have no one in Yemen. No one. My entire family is here. My father. My mother. My two brothers. My four sisters. All of them live in the United States. All of them are either citizens or permanent residents. If I am forced to return to Yemen, I will be completely alone. There will be no one to take me in. No one to help me with my children. No one to call if something goes wrong.
10. My family is originally from Aldhalea, near the border between northern and southern Yemen. The Houthis control our area, but other armed groups are close by. The region is dangerous. It could become a front line at any time. I have no relatives left there. I could not go back to that place. And I have nowhere else in Yemen to go. Without family, I would have nothing.
11. My children are Americans. This is their home. This is the only country they know. Yemen is a place they have never seen. If we are forced to go there, I do not know how I would keep them safe. I do not know what the schools would be like, or if they could even attend. I do not know how I would protect them from the violence, the instability, the danger that is everywhere. As a mother and as a woman alone, I would not be able to work to support and care for my children—let alone find a job with my degree in Educational Psychology. I would be alone with three children in a war zone, with no family and no help.
12. And if I lose my work authorization, I cannot even provide for them here. I will have no legal way to support my family.
13. I am very concerned that the United States government could retaliate against me or my family because of my participation in this case. I am also afraid that if I am forced to return to Yemen, the Houthis could target me because of what this lawsuit says about them. I am asking to proceed anonymously because I am genuinely scared of what could happen to me and my children.
14. I am willing to serve as a class representative on behalf of other Yemeni TPS holders who are facing the same fear and uncertainty that I am facing. My attorneys have explained to me the responsibilities of a class representative, and I understand that it means standing up not only for myself but also for others in the same situation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Detroit, MI

March 21, 2026

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A handwritten signature in black ink, consisting of a stylized, cursive name, is written over a horizontal line.

**Exhibit 3: Declaration of Faiz Doe**

## DECLARATION OF FAIZ DOE

I, Faiz Doe, declare as follows:

1. I was born in Northern Yemen in 1976. I am 50 years old. I currently live in Brooklyn, New York.
2. I entered the United States in May 2024 on a temporary visa. I received TPS in October 2024. TPS is my only protection from deportation. It is the only thing that allows me to work. If it is taken from me, I will have nothing. I currently work for a car service in New York City. It is not the work I trained for, but it is honest work, and it allows me to support my children and extended family members who depend on me.
3. For most of my adult life, I worked in the human rights field. I started with the Yemen Red Crescent in 2007, working jointly with the Red Cross as a communication officer. I did that for five years. Then I worked with Islamic Relief in partnership with UNHCR. Then I joined the Danish Refugee Council, where I became a Senior Child Protection Officer. I was the head of staff reporting violations of child labor—including the recruitment of child soldiers.
4. That work made me a target. And it is why I will be killed if I am sent back to Yemen.
5. The Houthis recruit children into their militias. Boys as young as thirteen. Sometimes younger. We investigated these cases. We documented sixth graders being forced to fight. We reported it. The Houthis confronted us. They asked, "Why are you attacking us?" But we were not attacking anyone. We were trying to protect children. To them, that was a crime and I was an enemy.
6. Because of my work, I was accused of being a spy for the United States and Israel. They said I was using my humanitarian work as cover to monitor their military movements. This was a lie. But it did not matter. Once you are accused, you are guilty. Once you are guilty, you disappear.
7. They surveilled me constantly. They put a camera on my house. They confiscated my phone. They took my printers. They wanted me to know I was being watched. They wanted me to be afraid and it worked. I was terrified.
8. I had every reason to be terrified I have seen what happens to people like me. These are not strangers. These are people I worked with. People I knew. People I sat next to. More than seven of my friends have gone to jail for defending human rights. A number of them died there. They did not survive what was done to them. One colleague, who was an American citizen, was held for seven months. Another colleague spent forty days in a cell that was one meter by one meter. A cell so small you cannot lie down. You cannot stretch your legs. You cannot move. You sit in the dark and wait. Your body breaks. Your mind breaks. And even many of the ones who are released suffered from chronic diseases because of what was done to them inside.

9. When I think about being sent back, this is what I see. This is not a possibility. This is a certainty. I know what is waiting for me.
10. I tried to escape Yemen once before. I was caught. They photographed me like a criminal. They let me go but they did not forget. I had to stay for three more years after that, living under their surveillance, knowing they were watching, knowing they could come for me at any time.
11. In 2020, I finally got out. I could not take a bus. I could not go through official channels. It was too dangerous. I hired smugglers and went by car. We passed through thirty-five checkpoints. Thirty-five chances to be caught, arrested, taken. To get through, I lied. I told them I had cancer. I carried fake hospital documents. That is what it took to escape my own country. I had to pretend I was dying just to have a chance to live.
12. I went first to Egypt, then to Saudi Arabia, then to the Emirates. In those places, there is safety. There is law. In Yemen, there is neither.
13. If I am forced to return to Yemen now, I will not survive. I am certain of this. People who worked with NGOs, with international organizations, with anything connected to the West—they are arrested immediately. Many of them are never seen again. And I am not just any NGO worker. I am someone who documented the Houthis recruiting children. I am someone who reported their abuses to the international community. I am someone they already accused of being a spy. I am someone they already caught trying to escape. They have my photograph. They have my file. They know exactly who I am.
14. And now I have been living in America. To them, this is the final proof. This confirms everything they suspected. In their eyes, I was a spy all along, and now I have gone to the enemy. It does not matter that none of this is true. The truth will not protect me. Nothing will protect me.
15. The situation has only gotten more dangerous. The conflict between the Houthis and the United States over the war with Iran has made them more paranoid than ever. They see spies everywhere. They trust no one. Anyone with connections to the West is a target. Anyone who ever worked with international organizations is automatically suspect. And someone like me—someone who documented their crimes, someone who has been living in America—I am not just suspect. I am condemned.
16. I cannot relocate to another part of Yemen. Even the areas the Houthis do not control are not safe for me. When I passed through Aden, I was treated as suspicious simply because I am from the Houthi stronghold area. They assumed I must be Houthi. My family is Sunni, and the Houthis are Shia, but it does not matter. In one place I am suspected because of my work. In another place I am suspected because of where I was born. There is nowhere in Yemen where I would be safe.
17. I am divorced. My three daughters and my son still live in Yemen. I send them five hundred dollars every month. It is the only way I can take care of them. I also support my brothers, my sisters, my mother—who is now in Riyadh with a heart condition. In total, I

help support seven households. If I lose my work authorization, all of that stops. They will have nothing. I am the only thing standing between them and complete poverty.

18. My brothers have begged me not to speak out. They said, "Forget human rights. Don't talk. Don't go to the media. Don't draw attention." They have farms in Yemen. They cannot leave. They are terrified that if I say anything publicly, the Houthis will come for them. I have stopped contacting them regularly just to keep them safe. I cannot even talk to my own brothers because I am afraid of what it might cost them.
19. I am afraid to be part of this lawsuit. I am afraid for my children. I am afraid for my brothers. I am afraid that this case, which makes claims about the Houthis' human rights abuses, will make my family a target. But I also know what it means to stand up for others. I spent my whole career doing that. I documented abuses. I protected children. I told the truth even when it was dangerous. I cannot stop now.
20. I am willing to serve as a class representative in this case. My lawyers have explained what that involves. As a former human rights worker and as someone who has dedicated his life to defending others, I would be proud to stand up for Yemeni TPS holders who are facing the same terror I am facing. I have done this work before. I will do it again. Even if I am afraid.
21. I respectfully ask to proceed in this case anonymously, to protect my children in Yemen and my family members throughout the region.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Brooklyn, NY  
March 21, 2026

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A handwritten signature in black ink, consisting of several loops and a long vertical tail, is written over a horizontal line. The signature is positioned to the right of the 'x' mark.

**Exhibit 4: Declaration of Ebe Doe**

## DECLARATION OF EBE DOE

I, Ebe Doe, declare as follows:

1. I was born in Saudi Arabia in 1989. I am a Yemeni citizen. I am 36 years old. My family is originally from Ibb, in northern Yemen. I currently live in Houston, Texas.
2. I came to the United States in November 2018 on a student visa. I came here to study for the United States Medical Licensing Examination at an educational institute in Houston.
3. I hold a Bachelor of Medicine and Surgery from the University of Science and Technology in Yemen. I have always wanted to be a physician. That dream is why I am here.
4. I grew up going back and forth between Saudi Arabia and Yemen. . In 2008, I moved to Yemen to continue my studies because, as a Yemeni born and living in Saudi Arabia, I was not allowed to attend school there under Saudi law. For several years, life was relatively safe and predictable enough. But everything changed in 2015, when the Houthis attacked Sana'a and the war began. After that, life for women became increasingly restricted. If I wanted to travel, I needed a male relative like my brother or father to accompany me. I could not move freely. I could not make decisions about my own life. The opportunities I had worked for began to disappear.
5. I knew that if I stayed, I would never be able to practice medicine the way I wanted. I would never be able to build a real career. So I left. I came to the United States to pursue my dream.
6. When President Biden redesignated TPS for Yemen, I applied and was granted Temporary Protected Status in 2021. TPS is now my only protection from deportation. It is the only thing that allows me to work. It is the only reason I have been able to continue building my life here.
7. Since receiving TPS, I have put in a lot of effort to becoming a physician. I currently work as a Clinical Research Specialist at a local hospital. I work with the Department of Hematology and Oncology here and support clinical trials and medical research. I assist physicians and researchers in ensuring the accuracy and quality of clinical data. The trials I work on contribute to the development of new treatments for cancer patients. Being able to participate in research that may save lives is deeply meaningful to me.
8. I have also contributed to multiple scientific publications in collaboration with physicians and research teams. This work represents years of effort and dedication. It is work that matters—work that advances medical knowledge and may help patients around the world. I am proud of what I have been able to accomplish here.
9. At the same time, I have continued to pursue my dream of becoming a licensed physician. I passed Step 1 of the USMLE in 2020. I passed Step 2 in 2021. I am preparing to take Step 3 and the required English proficiency exam. I plan to apply in December 2026. After that, my goal is to obtain a medical residency in the United States

and practice medicine. This has been my dream for as long as I can remember. I am so close to achieving it.

10. If my TPS is terminated, I will lose everything. I will lose my work authorization and my job. I will lose the ability to complete my medical licensing exams. I will lose the career I have spent years building. Everything I have worked for, every exam I have passed, every publication I have contributed to, every hour I have spent in the hospital, every sacrifice I have made, will be taken from me.
11. And if I am forced to return to Yemen, I will face dangers that go far beyond losing my career. My hometown of Ibb is in northern Yemen, in territory controlled by the Houthis. My parents still live there. My siblings are still in Yemen. I know what life is like for them. I know what life would be like for me.
12. Women in Houthi-controlled areas face severe restrictions. We cannot travel freely. We cannot work independently. We cannot make basic decisions about our own lives without the permission of a male relative. For a woman like me with professional training, especially a woman who has lived in the United States, who has worked in medical research, who has studied for American medical exam, there is no place for me in Yemen. There is no future. The professional life I have built here would be impossible there.
13. The southern regions of Yemen are not a safe alternative. Although the south is not controlled by the Houthis, it remains deeply unstable. There are ongoing security challenges, political instability, and economic hardship throughout the country. Infrastructure has been destroyed. Unemployment is widespread. Basic resources are scarce. There is nowhere in Yemen where I could safely live and work.
14. There is no cancer research in Yemen. There are no clinical trials. There are no opportunities for someone with my training. The healthcare system has been devastated by years of war. Hospitals have been destroyed. Doctors have fled. Even basic medical care is hard to find. The work I do in Houston, work that helps develop new treatments for cancer patients, does not exist there.
15. I am also afraid of what would happen to me as a woman who has lived in America for years. People who return from the West are viewed with suspicion. They are seen as having been influenced by foreign ideas, as having different education and lifestyles. For a woman, this is even more dangerous. I would be seen as someone who has lived outside the rules, outside the restrictions. I do not know what that would mean for my safety.
16. The economic situation in Yemen is also catastrophic. There are almost no jobs. Families struggle to survive. Even if I could find work, which I could not, as a woman in a Houthi-controlled area, I would not be able to support myself, let alone help my family.
17. My family depends on me. My parents are in Ibb. My siblings are in Yemen. I send money to help them. If I lose my work authorization, I cannot help them anymore. They are already struggling. Without my support, I do not know what will happen to them.

18. I also have a brother in the United States who has TPS status. I am worried that if my name becomes known to the government because of this lawsuit, both of us could become targets for immigration enforcement. I am asking to proceed anonymously to protect myself and to protect him.
19. I have worked so hard to build a life here. I followed the law. I maintained my legal status. I paid my taxes. I contributed to medical research that helps cancer patients. I contributed to scientific publications. I studied for years to become a doctor. I did everything right. And now I am terrified that it could all be taken away.
20. I am willing to serve as a class representative for other Yemeni TPS holders who are facing the same fear I am facing. My lawyers have explained to me what that responsibility means. I understand that it means standing up not just for myself, but for others in the same situation. I am willing to do that.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Houston, TX

March 21, 2026

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**Exhibit 5: Declaration of Sam Doe**

## DECLARATION OF SAM DOE

I, Sam Doe, declare as follows:

1. I was born in 2001 in Ibb, Yemen. I am 25 years old. I am a Yemeni citizen. I currently live in Indianapolis, Indiana.
2. I came to the United States in June 2024 on a J-1 visa for an exchange program and internship. The visa was for three months. I finished the internship in September 2024. I applied for asylum immediately after. I completed the fingerprint stage of my asylum application in October 2024. I also applied for Temporary Protected Status.
3. I had been relying on my TPS application to have status here. Yemen is on the travel ban list, and because of that, asylum applications from Yemeni citizens are not being adjudicated. So as of right now, my asylum case is frozen. It is not moving and as far as I know, it may never move. TPS was my only real hope for protection—the only application that might actually be decided. And now that is under threat too.
4. I am trapped. I have no path forward. My asylum application is frozen. My TPS application is pending but the program itself may be terminated. I did everything I was supposed to do. I applied. I submitted my fingerprints. I followed every rule. And none of it matters, because the government has decided to terminate TPS while giving us no other way to get legal status here.
5. I live with my uncle in Indiana. He is the one of the very few family members I have in this country. I am completing my Bachelor of Science degree in business and informatics. I am trying to build a future. But every day I wake up not knowing if I will be allowed to stay.
6. I was last in Yemen in 2021. Even then, I knew it was not safe. It has only gotten worse. I am originally from Ibb, but my family lived in Sana'a, the capital. Sana'a has been controlled by the Houthis since 2014. My father had to move to Taiz, to the part of the city not controlled by the Houthis, because otherwise he could have been detained due to his work for the UN.
7. My father works for the United Nations in Yemen. His work makes him a target. In the last couple of months, the Houthis have been detaining people who work for the UN and other international organizations. They accuse them of being spies. My father's friends have been detained. While U.N. international staff have been evacuated from Yemen, the local staff in Yemen have no safe options and are still there working remotely. My father had to relocate temporarily to an area that is not controlled by the Houthis and is currently hiding with an undercover name. He is working to figure out a way to leave the country.
8. Everyone with my last name is considered an enemy by the Houthis. The Houthis know who we are. They do not forget. Years ago, I was detained once when I was in Yemen so I know what it feels like to be taken. I know what it feels like to not know if you will come home.

9. If I am sent back to Yemen, I will face dangers I cannot escape. As a 25-year-old man, I would be required to serve in the military. The official government would want me to serve. But the Houthis, who control where my family live, would demand that I fight for them. I would be forcibly recruited and required to take up arms for them. I would be forced to fight in a war I do not believe in, for people who have terrorized my family and my community. If I refused, I do not know what they would do to me. But I know it would not be good.
10. And if the Houthis found out I had been living in America? It would be even worse. They would ask: why did they send you back? They would assume I was a spy. They would detain me, interrogate me, and very likely, kill me. This is not speculation. This is what happens to people who return from the West. The Houthis are paranoid. They see enemies everywhere. And as a young man from an enemy tribe, with a father who works for the UN, returning from America, I would be everything they are afraid of.
11. Yemen is a disaster. There is war. There is so much disease including cholera. There is hunger. The infrastructure has collapsed. The healthcare system has collapsed. We have no economy. Even if you set all of this aside, how could anyone live a normal life there with the forced recruitment, the targeting, the detention?
12. I have tried to do everything right. I completed my program requirements and internship. I applied for asylum. I applied for TPS. I submitted my fingerprints. I followed every rule. But because I am Yemeni, my applications are not being processed. I have no options. I am just waiting for someone to decide whether I will be allowed to stay or sent back to face everything I have just described.
13. I had concerns about being a plaintiff in this lawsuit. I am afraid that if the U.S. government knows I am involved, it could hurt my asylum case, if it ever gets adjudicated. I am afraid that I will be singled out, targeted, treated as a troublemaker instead of as someone who just wants to be safe. But I am also afraid of what happens if I stay silent. If no one speaks up, nothing will change.
14. I am willing to serve as a class representative for other Yemeni TPS applicants and holders who are facing the same impossible situation. My lawyers have explained what that means. I understand that it means standing up not just for myself, but for everyone who is trapped the way I am trapped. I am willing to do that. I want a future. And right now, that future depends on this case.
15. I respectfully ask to proceed in this case anonymously to protect myself, to protect my father who still works in Yemen, and to protect my brothers who are still living under Houthi control.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Indianapolis, IN  
March 21, 2026

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**Exhibit 6: Declaration of Ali Doe**

## DECLARATION OF ALI DOE

I, Ali Doe, declare as follows:

1. I was born in 1994 in Riyadh, Saudi Arabia I am 32 years old. I am a Yemeni citizen. I currently live in Brooklyn, New York.
2. I entered the United States in 2021 on an F-1 student visa. I received Temporary Protected Status in 2022. TPS is my only protection from deportation. It is the only thing that allows me to work. If it is taken from me, I lose everything. If I am sent back to Yemen, I will be killed.
3. My father is on a Houthi target list. My father's family is on a Houthi target list. And because of the work I did alongside my father, I am on that list too.
4. For most of my life, my family lived in Sana'a while my father worked at the Yemeni embassy in Saudi Arabia. He was based in Jeddah, as part of the joint command for the Saudi-led coalition. His job was to recruit soldiers to fight against the Houthis. He produced travel documents for Yemeni fighters going to join the coalition. Later, when soldiers were wounded, he helped them obtain papers so they could travel abroad for medical care.
5. My father's work ultimately has saved so many lives. It has also made my father an enemy of the Houthis. And it has made our entire family enemies too.
6. I was part of this work. I was in Saudi Arabia, at the military bases. I would collect travel documents from the wounded soldiers and bring the documents to the embassy to process their passports. I helped men who had been fighting the Houthis get the medical care they needed abroad. I did it because it was right. But the Houthis do not see it that way. To them, I am a collaborator. To them, I am a traitor. To them, I am someone who must be punished.
7. We were told directly: if we return to Sana'a to our home, we will be targeted. Our names are on lists. They know who we are. They know what we did. And they are waiting.
8. They have already tried to kill my father once. It happened at Alwadiah, near the Saudi-Yemeni border. The Houthis came for him and tried to assassinate him. My father only survived because Saudi troops were nearby and intervened. If they had not been there, my father would be dead. My father's activities were reported in Al Jazeera and were well known. The whole world could see what happened. The Houthis wanted him dead, and they almost succeeded.
9. My father cannot go home. Our house is in Sana'a. The home where I grew up. The place where our life was. But my father cannot set foot there. If he does, he will not survive. So he stays in Aden now, even though Aden is not safe either.
10. The south is mostly controlled by the Southern Transitional Council (STC) forces. My father opposes them. He works for the officially recognized Yemeni government—the


legitimate government—as part of the Ministry of Foreign Affairs. That makes him an enemy of the STC as well. In the north, the Houthis want him dead. In the south, the STC sees him as a threat. The situation is so dangerous that even the president of the Yemeni Presidential Leadership Council cannot safely return to Aden. The president of Yemen cannot go to Aden. And my father is there, exposed, with no protection.

11. If my father is not safe, I am not safe. I carry a diplomatic passport. It is my only government identification. It identifies me as the son of a Yemeni diplomat, a diplomat who worked for the Saudi coalition, who recruited soldiers to fight the Houthis, who helped wounded fighters escape to get medical care. Unfortunately, rather than protecting me, that passport condemns me as proof of who I am. If I am sent back to Yemen and the Houthis find that passport, they will know exactly who I am. And they will know exactly what to do with me.
12. There is nowhere in Yemen I can go to be safe. In the north, the Houthis control everything. My father and uncles's names are on the Houthis' list, alongside mine. If I go to Sana'a, I will be detained, interrogated, and tortured. I am sure they will disappear me. I have heard what happens to people the Houthis take. I have heard about the prisons. I have heard about men who never come out. That is what is waiting for me.
13. In the south, my father's position with the legitimate government makes us enemies of the STC. I would not be welcome. I would not be safe. I would be a target there too.
14. There is no safe zone. There is no neutral ground. If I am deported to Yemen, I am being sent to die.
15. Right now, I live in Brooklyn. I have a degree in architecture from King Abdulaziz University in Saudi Arabia. I currently work as a cashier in a convenience store. This is not the career I imagined but it allows me to do the one thing that matters most to me: support my family.
16. My mother lives in Saudi Arabia. My father is in Aden. My siblings depend on me. My brother has his own family so it is a lot more difficult for him to send money home. My father works for the government, but he does not always get paid on time and sometimes goes unpaid for months. I send money for rent. For food. For medicine. For everything. Without me, my family cannot survive. They cannot pay for necessities. If I lose my work authorization, they lose their lifeline.
17. I visited my mother in Saudi Arabia in 2024, using a TPS travel document. I held her. I saw how much she has aged from the stress, from the fear, from years of not knowing if her family will survive. When I left, I did not know if I would ever see her again. That is how we live now. That is what this uncertainty has done to us.
18. I do not want to start over. Almost every part of my life is here now. My work is here. My future is here. I have followed every rule and obeyed every law. And now I am being told that none of it matters. That I could be sent back to a country where people are waiting to kill me. That my life, my safety, my family's survival, none of it counts.

19. It was a difficult choice for me to be a plaintiff in this suit because this case makes claims about the Houthis' human rights record. If they find out I am involved, I am afraid that my family in Yemen will pay the price. I am also afraid that if the U.S. government knows I am part of this case, I could be singled out for enforcement. I am taking a risk by speaking up. But I cannot stay silent.
20. I am willing to serve as a class representative for other Yemeni TPS holders who are facing the same danger I am facing. My lawyers have explained what that means. I understand that it means standing up for others, not just myself. I am willing to do that.
21. I respectfully ask to proceed in this case anonymously—to protect myself and to protect my family.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Brooklyn, NY  
March 21, 2026

  
x \_\_\_\_\_

**Exhibit 7: Declaration of Fahad Doe**

## DECLARATION OF FAHAD DOE

I, Fahad Doe, declare as follows:

1. I was born in 1994 in Saudi Arabia. I am 31 years old. I am a Yemeni citizen. I currently live in Florida.
2. I spent my entire childhood and young adulthood in Saudi Arabia. Yemen is a country I hold a passport from, but it is not a country I know. I am not familiar with the place and have never lived there. I have no life there. I have no connections there. I have only some female cousins remaining in Yemen. My family left because Yemen was too dangerous, too chaotic. They went to Egypt. And I came here.
3. I entered the United States in 2017 on an M-1 visa to train as a student pilot. I obtained TPS in 2018. TPS is my only protection from deportation and my only source of work authorization.
4. I came to this country to become a pilot. That has been my dream for as long as I can remember. And I did it. I built the career I dreamed of. I worked for years. I trained for thousands of hours. I invested everything I had.
5. I am a commercial pilot. I work as a flight instructor at a local school. I am an FAA-approved Check Airman at my company, which is someone trusted to evaluate and certify other pilots. I have maintained a clean professional record. I have approximately 1,500 hours of flight time. I have invested roughly \$100,000 of my own money to obtain all the certifications, ratings, and approvals required to serve as an airline pilot.
6. I completed every requirement. I was one step away from beginning my career as an airline pilot. Regional airlines pay \$90 to \$100 an hour. After years of training, years of working as an instructor at \$23 an hour, I was finally about to reach the goal I had sacrificed everything for. And then TPS was terminated.
7. The day the announcement came that TPS for Yemen was being terminated, my employer laid me off. My work authorization does not expire until May 4. I tried to explain that to them. I tried to argue that I could keep working until then. But I live in a small city where no one was willing to understand that. They saw the news. They got scared. And they let me go. Just like that, everything I built disappeared.
8. I am the sole financial supporter of my family. My father is dead. My mother and sibling are completely financially dependent upon me. If I cannot work, they have nothing. I have nothing. The career I spent years building, the \$100,000 I invested, the 1,500 hours I flew—all of it is worthless now. I cannot work. I cannot fly. I cannot provide for my family. I am just waiting.
9. And if I am forced to return to Yemen, it will be even worse. I have never lived in Yemen. I do not know how to survive there. I do not have a network. I do not have family who can help me. My relatives who are still there are opposed to the Houthi government,

which makes it difficult for them to find jobs. They cannot help me. They can barely help themselves.

10. My family is originally from Sana'a and Ibb, which are both areas controlled by the Houthis. If I am sent there, I will be viewed with immediate suspicion. I spent most of my life in Saudi Arabia and don't have status or cannot return there. I have lived in the United States for eight years. Yemen has terrible relationships with both countries. The Houthis see Saudi Arabia as their enemy. They see America as their enemy. And I have lived in both.
11. If the Houthis learn where I have been, they will assume the worst. They will think I am a spy. They will think I am an agent. I am confident that they would detain and interrogate me, most likely before killing me.
12. There is no aviation industry in Yemen. There are only three or four planes in the entire country of estimated 40 million. The airspace opens and closes unpredictably. Even if I were safe, which I am sure I would not be, there would be no way for me to use my skills, my training, my experience. Everything I have built would be useless. The career I have worked toward my entire adult life does not exist in Yemen.
13. I came to the United States and completed my program requirements. I have always remained in lawful status. I trained. I studied. I worked. I became a pilot. I became a Check Airman. I followed every rule. And now I have been laid off, I cannot work, and I am being told I might be sent to a country I have never lived in, where I would face suspicion and danger because of where I have been. I do not understand how any of this is happening.
14. I face considerable risks just by being a plaintiff in this lawsuit. I am afraid that if my involvement becomes known, I will be targeted for enforcement. I am afraid that I will be made an example of. But I am also afraid of staying silent while my life falls apart.
15. I am willing to serve as a class representative for other Yemeni TPS holders who are facing the same situation. My lawyers have explained what that means. I understand that it means representing not just myself, but everyone who is trapped the way I am trapped. I am willing to do that. Because what is happening to me is happening to thousands of people. It is not right and someone has to stand up.
16. I respectfully ask to proceed in this case anonymously to protect myself and to protect my family.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Florida  
March 21, 2026

x 