

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

NAVY SEAL #1, et al.

Plaintiffs,

v.

JOSEPH R. BIDEN, in his official capacity as
President of the United States, *et al.*

Defendants.

Case No. 8:21-cv-02429-SDM-TGW

DECLARATION OF CAPTAIN MERY-ANGELA SANABRIA KATSON, U.S. NAVY

I, Captain Mery-Angela Sanabria Katson, U.S. Navy, hereby state and declare as follows:

1. I am a captain in the United States Navy, currently serving as the Branch Head, Enlisted Plans and Policy (OPNAV N132), located in Arlington, Virginia. I make this declaration in my official capacity, based upon my personal knowledge and upon information that has been provided to me in the course of my official duties.

2. Subject to the data limitations and important context provided in my previous declaration, the attached exhibit reflects the data available as of February 3, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of February, 2022.



Mery-Angela Sanabria Katson

Captain, U.S. Navy

Exhibit 1 to Declaration of CAPT Katson

U.S. Navy Court-Ordered DataCurrent as of 3 February 2022

(1) Number of religious exemption from COVID-19 vaccination:

# Initial Requests Under Review	# Initial Request Approved	# Initial Requests Denied	# Denials Where Chaplain Determined Belief Sincere	Total Initial Requests
285	0	3,728	UNKNOWN	4,095

# Denials w/o Appeal Before Deadline ¹	# Appeals Under Review	# Appeals Denied	# Appeals Approved	Fully Resolved Requests	
				Aggregate # of Approved Requests	Aggregate # of Denied Requests
UNKNOWN	1,222	81	0	0	81

(2) Number of medical-exemption requests from COVID-19 vaccination:

Temporary Medical Exemption Requests	# Medical Exemptions Denied	# Medical Exemptions Granted		Total Medical Exemption Requests
UNKNOWN	UNKNOWN	Temporary ²	Permanent	UNKNOWN
		252	11	

(3) Number of other exemptions from COVID-19 vaccination granted for any other reason (i.e. administrative exemptions):

Emergency Leave	Permanent Change of Station (PCS)	Administrative Separation/ Terminal Leave	Administrative Temporary (i.e. no access to vaccine)
0	50	410	35

(4) Number of courts-martial and separation proceedings pending or concluded against a service member whose request for a religious exemption was denied after appeal:

Courts-Martial		Administrative Separation (ADSEP)	
Pending	Concluded	ADSEP Initiated	ADSEP Completed
0	N/A	UNKNOWN	240

¹ Appeals submitted after deadline will still be considered.² This number reflects the total number of active temporary exemptions, but does not include expired medical exemptions. Absent a new exemption, a member is required to obtain the COVID-19 vaccine after their temporary medical exemption expires.