

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent,
and next friend “SUSAN;” and “MATTHEW,”
by guardian, parent, and next friend “MARK;”
on behalf of themselves and all those similarly
situated,

Plaintiffs,

v.

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

Defendants.

Case No. 1:25-cv-244

DECLARATION OF BARBARA

I, Barbara, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Barbara. I am over the age of 18 and am competent to testify regarding the matters described below. I am a putative class member in this case.
2. I am a citizen of Honduras. I currently live in New Hampshire.
3. I have lived in the United States for the past year, since 2024.
4. I live with my husband and three children under the age of 14. All three of my children were born in Honduras.
5. In 2024, my husband, three children, and I came to the United States because we feared for our life. We were being targeted by the Mara 18 gang. We were given parole at the border. We have asylum applications pending.
6. Our family has built a life here. We attend a local church. My children go to school here. We have a lot of family close by, like my father, cousin, and cousin’s family.
7. We learned in or around February 2025 that I was pregnant with our fourth child.

My due date is in October 2025.

8. I heard about the president's executive order regarding birthright citizenship in or around February 2025.

9. I understand that, because neither my husband nor I am a citizen or lawful permanent resident (LPR) of the United States, the government will not recognize my child's U.S. citizenship by birthright.

10. I am fearful for my child's future in light of this executive order. My baby has the right to citizenship and a future in the United States. I want my baby to have access to opportunities, such as access to education and permission to work legally, in order to make a life for themselves. I also want my child to be safe. I do not want my child to live in fear and hiding. I do not want my child to be a target for immigration enforcement. I am not sure how my child would be added to my asylum application. This would affect the future of us as a family. I fear our family could be at risk of separation. I also do not want my child to have to move to Honduras.

11. I want to be a named plaintiff in this case. I understand that, if the Court grants the motion for class certification, I would represent a large number of people who: (a) do not have permanent status or citizenship; and (b) are expecting a child who will likely be born after the executive order goes into effect.

12. I understand that, as a class representative, it would be my responsibility to represent the interests of all the class members in this lawsuit, and not just my own personal interests. I also understand the need to stay informed about what is happening in the case.

13. I understand that I am agreeing to represent many other families like ours. I believe it is important to help families like ours.

14. I am scared about my identity and participation in this lawsuit being made public

because I fear for my and my family's safety. I fear that certain individuals would retaliate against us because of my participation in the lawsuit. I have heard about the current Administration or supporters retaliating against people who sue or speak out against the Administration.

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

/s/ Barbara
Barbara

Executed on April 30, 2025.