

1 JEFFREY M. DAVIDSON (SBN 248620)
ALAN BERSIN (SBN 63874)
2 COVINGTON & BURLING LLP
One Front Street, 35th Floor
3 San Francisco, CA 94111-5356
Telephone: (415) 591-6000
4 Facsimile: (415) 591-6091
Email: jdavidson@cov.com,
5 abersin@cov.com
*Attorneys for Plaintiffs The Regents of the
6 University of California and Janet Napolitano, in
her official capacity as President of the
7 University of California*

8 THEODORE J. BOUTROUS, JR. (SBN 132099)
ETHAN D. DETTMER (SBN 196046)
9 JESSE S. GABRIEL (SBN 263137)
GIBSON, DUNN & CRUTCHER LLP
10 333 South Grand Avenue
Los Angeles, CA 90071-3197
11 Telephone: (213) 229-7000
Facsimile: (213) 229-7520
12 Email: tboutrous@gibsondunn.com,
edettmer@gibsondunn.com,
13 jgabriel@gibsondunn.com
*Attorneys for Plaintiffs Dulce Garcia, Miriam
14 Gonzalez Avila, Saul Jimenez Suarez, Viridiana
Chabolla Mendoza, Norma Ramirez, and Jirayut
15 Latthivongskorn*

XAVIER BECERRA
Attorney General of California
MICHAEL L. NEWMAN
Supervising Deputy Attorney General
JAMES F. ZAHRADKA II (SBN 196822)
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1247
Email: James.Zahradka@doj.ca.gov
Attorneys for Plaintiff State of California

JOSEPH W. COTCHETT (SBN 36324)
NANCY L. FINEMAN (SBN 124870)
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: nfineman@cpmlegal.com
Attorneys for Plaintiff City of San Jose

JONATHAN WEISSGLASS (SBN 185008)
STACEY M. LEYTON (SBN 203827)
ERIC P. BROWN (SBN 284245)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
Facsimile: (415) 362-8064
Email: jweissglass@altber.com
*Attorneys for Plaintiffs County of Santa Clara and
Service Employees International Union Local 521*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA and JANET NAPOLITANO,
22 in her official capacity as President of the
University of California,

23 Plaintiffs,

24 v.

25 U.S. DEPARTMENT OF HOMELAND
SECURITY and ELAINE DUKE, in her
26 official capacity as Acting Secretary of the
Department of Homeland Security,

27 Defendants.
28

CASE NO. 17-CV-05211-WHA

**DECLARATION OF GEOFFREY H.
YOUNG, PhD, IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR
PRELIMINARY INJUNCTION AND FOR
SUMMARY JUDGMENT**

1 STATE OF CALIFORNIA, STATE OF
2 MAINE, STATE OF MARYLAND, and
STATE OF MINNESOTA,

3 Plaintiffs,

4 v.

5 U.S. DEPARTMENT OF HOMELAND
6 SECURITY, ELAINE DUKE, in her official
7 capacity as Acting Secretary of the Department
of Homeland Security, and the UNITED
STATES OF AMERICA,

8 Defendants.

CASE NO. 17-CV-05235-WHA

9 CITY OF SAN JOSE, a municipal corporation,

10 Plaintiffs,

11 v.

12 DONALD J. TRUMP, President of the United
13 States, in his official capacity, ELAINE C.
DUKE, in her official capacity, and the
UNITED STATES OF AMERICA,

14 Defendants.

CASE NO. 17-CV-05329-WHA

15 DULCE GARCIA, MIRIAM GONZALEZ
16 AVILA, SAUL JIMENEZ SUAREZ,
17 VIRIDIANA CHABOLLA MENDOZA,
18 NORMA RAMIREZ, and JIRAYUT
LATTHIVONGSKORN,

19 Plaintiffs,

20 v.

21 UNITED STATES OF AMERICA, DONALD
22 J. TRUMP, in his official capacity as President
of the United States, U.S. DEPARTMENT OF
23 HOMELAND SECURITY, and ELAINE
DUKE, in her official capacity as Acting
Secretary of Homeland Security,

24 Defendants.

CASE NO. 17-CV-05380-WHA

1 COUNTY OF SANTA CLARA and
2 SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 521,

3 Plaintiffs,

4 v.

5 DONALD J. TRUMP, in his official capacity
as President of the United States, JEFFERSON
6 BEAUREGARD SESSIONS, in his official
capacity as Attorney General of the United
7 States; ELAINE DUKE, in her official
capacity as Acting Secretary of the Department
8 of Homeland Security; and U.S.
DEPARTMENT OF HOMELAND
9 SECURITY,

10 Defendants.

CASE NO. 17-CV-05813-WHA

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 I, GEOFFREY H. YOUNG, PhD, DECLARE:

2 1. I am Senior Director, Student Affairs and Programs, at the Association of American
3 Medical Colleges ("AAMC"). I have held this position since 2011. In this role, I am responsible for the
4 program and services directed to the medical school student affairs community. I oversee AAMC's
5 efforts to optimize the professional and educational development and informed decision making of
6 medical school professionals and learners (from aspiring physicians to medical residents) through the
7 development and delivery of programs, learning opportunities, resources, and other sources of support,
8 as well as the collection, analysis, and sharing of data within the medical education continuum. I have
9 personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would
10 competently testify to them.

11 2. I earned my B.A. from Hampton University, Hampton VA, and my M.A. and PhD in
12 clinical psychology at the Ohio State University. I began my clinical career in 1990 at the University of
13 Medicine and Dentistry of New Jersey-University Behavioral Healthcare (now Rutgers University
14 Behavioral Health Care) treating adults and children living in underserved communities. I joined the
15 faculty at the UMDNJ-Robert Wood Johnson Medical School (now Rutgers University Robert Wood
16 Johnson Medical School) in 1995 and was appointed Assistant Dean for Student and Multicultural
17 Affairs in 1996. I served as Assistant Dean for Student Affairs at RWJMS between 1999 and 2004. I
18 served as the Associate Dean for Student Affairs at the Medical College of Virginia Campus of Virginia
19 Commonwealth University between 2004 and 2007 where I was the principal student affairs officer and
20 primary spokesperson with students, parents, faculty, and administrators about student-related issues on
21 the campus. I joined the AAMC after serving as the Associate Dean for Admissions at the Medical
22 College of Georgia at Georgia Regents University (now Medical College of Georgia at August
23 University). AAMC is a not-for-profit association dedicated to transforming health care through
24 innovative medical education, cutting-edge patient care, and groundbreaking medical research.

25 3. AAMC's members comprise all 147 accredited U.S. medical schools, nearly 400 major
26 teaching hospitals and health systems, and more than 80 academic societies. Through these institutions
27 and organizations, the AAMC serves the leaders of America's medical schools and teaching hospitals
28

1 and their nearly 167,000 full-time faculty members, 88,000 medical students, and 124,000 resident
2 physicians.

3 4. Prior to the establishment of the DACA program, through my contacts with university
4 and medical school officials, I learned of college students who wished to attend medical school and
5 become physicians but who were unable to do so because of their undocumented status. Once the
6 DACA program was established I was advised that students with DACA students were successful in
7 gaining admission and matriculating at medical schools throughout the country.

8 5. Currently there are approximately 100 medical students and medical resident physicians
9 with Deferred Action for Childhood Arrivals ("DACA") status in AAMC member medical schools and
10 teaching hospitals. These individuals, in qualifying for DACA status and pursuing a medical education,
11 have demonstrated a commitment to acquiring the skills and professional attributes of a physician to
12 improve the health of Americans throughout the country.

13 6. With the nation's population growing and becoming more diverse, it is crucial that our
14 physician workforce is prepared to mitigate racial, ethnic, and socioeconomic health disparities.
15 Aspiring physicians with DACA status help our country produce a diverse and culturally responsive
16 health care workforce to meet the needs of underserved populations, improve cultural awareness, and
17 promote health equity. As an example, research demonstrates that concordance in race-ethnicity and
18 language between physician and patient can overcome stigma associated with conditions like mental
19 illness, with minority patients demonstrating a greater willingness to seek care from physicians of
20 similar backgrounds.

21 7. Research demonstrates that diversity in the health professions leads to improvements in
22 access to care for the underserved and in quality care overall. We have found that diversity contributes
23 to increased exposure to divergent perspectives, enhances cognitive complexity, promotes civic
24 engagement and facilitates more inclusive teaching and educational content. Diverse medical school
25 classes enhance the ability of the entire health professional workforce to provide culturally competent
26 care to individuals regardless of their background. Diversity in health professional teams has
27 contributed to greater productivity, creativity and innovation, with positive implications for advancing
28 science and health care.

