

Exhibit C

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THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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

Plaintiffs,

v.

DONALD TRUMP, President of the United  
States, *et al.*,

Defendants.

No. 2:17-cv-00094-RAJ

PLAINTIFFS' SECOND SUPPLEMENTAL  
INITIAL DISCLOSURES

Plaintiffs submit the following Second Supplemental Initial Disclosures in accord with Federal Rule of Civil Procedure 26(a)(1) and Rule 26(e)(1)(A), based on information and documents presently available to Plaintiffs. Plaintiffs do not represent that they are identifying every document or witness possibly relevant to this action. These disclosures are submitted without benefit of complete discovery. Plaintiffs reserve the right to further supplement and/or amend information contained in these disclosures in accordance with the provisions of Rule 26(e)(1)(A) of the Federal Rules of Civil Procedure, to the extent additional information becomes available.

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29. Margo Schlanger  
Former Officer for Civil Rights and Civil Liberties, U.S. Department of  
Homeland Security  
Ann Arbor, Michigan

Ms. Schlanger is likely to have discoverable information concerning the development, implementation, and use of CARRP and other “extreme vetting” policies.

30. Tuyet Duong  
Former Policy Advisor, U.S. Department of Homeland Security

Ms. Doung is likely to have discoverable information concerning the development, implementation, and use of CARRP and other “extreme vetting” policies.

31. Class members who have responded to Plaintiffs’ Class List posting.

These individuals are likely to have discoverable information concerning their naturalization or adjustment of status applications.

32. Class members identified in the Class Lists periodically produced by Defendants.

These individuals are likely to have discoverable information concerning their naturalization or adjustment of status applications.

32. Other USCIS officers whose identities are apparent from the A-Files produced by Defendants.

These USCIS officers are likely to have discoverable information regarding the handling, processing, and adjudication of immigration benefit applications subjected to CARRP.

33. Attorneys whose clients have been or are presently subjected to CARRP.

These attorneys are likely to have discoverable information regarding the handling, processing, and adjudication of their clients’ immigration benefit applications.

34. Individuals identified in Defendants’ Initial, First Supplemental, and Second Supplemental, and Third Supplemental Disclosures.

1 DATED: November 29, 2019

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1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on November 29, 2019, I caused service of the foregoing  
3 document via email to all counsel of record herein.

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DATED this 29th day of November, 2019, at Seattle, Washington.

By: s/ Cristina Sepe  
Cristina Sepe, WSBA #53609