

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

CASA DE MARYLAND, INC., *et al.*,

Plaintiffs,

v.

MAYORKAS, *et al.*,

Defendants.

Case No. 20-2118-PX

DECLARATION OF JUNHAO TAN

I, Junhao Tan, being over 18 years old and fully competent to make this declaration, declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection:

1. My name is Junhao Tan.
2. I am 38 years old.
3. I am from Singapore.
4. I am currently living in Durham, North Carolina.
5. I applied for asylum in the United States in February 2022.
6. I waited at least 150 days after I filed my asylum application to apply for a work permit.
7. I submitted my work permit application based on my pending asylum application in late July 2022.
8. I received a receipt notice from USCIS that says that my work permit application was received on July 25, 2022.
9. I am a member of the Asylum Seeker Advocacy Project (“ASAP”).

10. I included proof of my ASAP membership in my work permit application as instructed by the USCIS website.
11. It has been 46 days since USCIS received my work permit application, and I have still not received my work permit.
12. Because I have not gotten my work permit and I cannot legally work in the United States, I am struggling to pay for my basic necessities. I am running out of savings.
13. I will not be able to afford to pay my rent after one more month.
14. In order to eat, I have had to rely on soup kitchens and meals from my friends.
15. I also have \$150,000 in student loans and I need to make loan payments each month.
16. I have worked in the healthcare industry for a long time. In Singapore, I was a pharmacist and then I worked for a couple of years in the pharmaceutical industry, first with Merck in medical affairs and then at GSK with quality assurance.
17. I am hoping to get a job in the U.S. as a healthcare consultant. I have identified several available jobs that I am qualified for.
18. I have not applied to these jobs yet because I do not know when my work permit will arrive.
19. In Singapore, I suffered abuse and trauma related to my LGBTQ identity.
20. I have been diagnosed with depression and prescribed antidepressants.
21. I have run out of antidepressants, and I need follow up mental health treatment.
22. Without an EAD, I have not been able to get the health insurance that I need to pay for mental health treatment. I am feeling desperate. I feel trapped at home every day, just waiting for my EAD.

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In conformity with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 9, 2022 in Durham, North Carolina.



JUNHAO TAN •

9/9/2022

DATE