

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PARS EQUALITY CENTER, IRANIAN
AMERICAN BAR ASSOCIATION,
NATIONAL IRANIAN AMERICAN
COUNCIL, PUBLIC AFFAIRS ALLIANCE
OF IRANIAN AMERICANS, INC., et al.,

Plaintiffs,

v.

DONALD J. TRUMP et al.,

Defendants.

Civil Action No. 1:17-cv-255

Hon. Tanya S. Chutkan

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs¹—individual Iranian nationals and four national Iranian-American organizations—hereby move for a preliminary injunction as set forth below and for the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction (“Memorandum”). *See* Fed. R. Civ. P. 65(a). Plaintiffs seek to enjoin Defendants from enforcing or implementing certain provisions of President Donald J. Trump's Executive Order No. 13,780, entitled “Protecting the Nation from Foreign Terrorist Entry into the United States.” As demonstrated in the Memorandum, the Executive Order and Defendants'

¹ This Motion for a preliminary injunction is filed, by and through undersigned counsel, on behalf of organizational Plaintiffs Pars Equality Center, Iranian American Bar Association, National Iranian American Council and Public Affairs Alliance of Iranian Americans, Inc. as well as individual Plaintiffs Ali Asaei, Shiva Hissong, John Doe #1, John Doe #3, John Doe #5, on behalf of himself and his minor child Baby Doe #1, John Doe #7, John Doe #8, Jane Doe #1, Jane Doe #4, Jane Doe #8, Jane Doe #9, Jane Doe #10, Jane Doe #11, Jane Doe #12, and Jane Doe #13. The remaining individual Plaintiffs were harmed by Defendants' conduct and remain Plaintiffs in the above-captioned matter for purposes of seeking permanent relief.

implementation of it violate the First and Fifth Amendments of the U.S. Constitution, the Immigration and Nationality Act and its implementing regulations, and the Administrative Procedure Act. Defendants should be enjoined from enforcing or implementing §§ 2(c)-(e), 3, 6(a), and 6(c) of the Executive Order.

Pursuant to Local Rule 7(m), counsel for Plaintiffs state that they have conferred with opposing counsel regarding the filing of this motion for preliminary injunction. Defendants intend to file a response to the motion for preliminary injunction in accordance with the Court's scheduling order. Dkt. 33.

For the foregoing reasons, Plaintiffs respectfully request that this Court grant their Motion for Preliminary Injunction.

A proposed Order is attached hereto.

Dated: March 15, 2017

Respectfully submitted,

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**Pro hac vice motion forthcoming*