

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

PARS EQUALITY CENTER, IRANIAN  
AMERICAN BAR ASSOCIATION, 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**

Plaintiffs<sup>1</sup>—individual Iranian nationals and three 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 September 24, 2017 Proclamation, entitled "Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry into the United States By Terrorists or other Public-Safety Threats." Proclamation No. 9645, 82 Fed. Reg. 45,161 (Sept. 24, 2017). As demonstrated in the

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<sup>1</sup> 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, and Public Affairs Alliance of Iranian Americans, Inc. as well as individual Plaintiffs Shiva Hissong, Montra Yazdani, Sepideh Ghajar, Mohammad Reza Shaeri, Mohammed Jahanfar, John Doe #1, John Doe #9, John Doe #10, Jane Doe #1, Jane Doe #4, Jane Doe #13, Jane Doe #14, and Jane Doe #15. The remaining individual Plaintiffs were harmed by Defendants' conduct and remain Plaintiffs in the above-captioned matter for purposes of seeking permanent relief.

Memorandum, the Proclamation and Defendants' enforcement 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 and 3(c) of the Proclamation.

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 oppose this relief.

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

A proposed Order is attached hereto.

Dated: October 12, 2017

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, John A. Freedman, hereby certify that on October 12, 2017, the foregoing document was filed and served through the CM/ECF system.

/s/ John A. Freedman

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