

**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 TO LIFT THE STAY AND FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

On June 20, 2017, this Court entered a stay of proceedings pending a final decision by the United States Supreme Court in *IRAP v. Trump*. ECF 91. The Court stated, however, that “[i]f circumstances change prior to the Supreme Court issuing its final decision, any party may file a motion to lift the stay and may then re-file a motion for a preliminary injunction.” *Id.* at 2.

For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs hereby move to lift the stay and for a temporary restraining order and preliminary injunction to enjoin enforcement of §§ 2(c) and 6(a) of the March 6 Executive Order against Plaintiffs Jane Doe #8 and Jane Doe #9 and others similarly situated. *See* Fed. R. Civ. P. 65. Counsel for Plaintiffs state that they have conferred with opposing counsel regarding the filing of this motion. *See* Local Rule 7(m). Opposing counsel’s position on this motion is set forth in Exhibit 3 (attached).

For the foregoing reasons, Plaintiffs respectfully request that this Court grant their Motion to Lift the Stay and for a Temporary Restraining Order and Preliminary Injunction.

A proposed Order is attached hereto.

Dated: June 28, 2017

Respectfully submitted,

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**Pro hac vice motion pending*