

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ARAB AMERICAN CIVIL RIGHTS
LEAGUE (“ACRL”), SAMIR
ALMASMARI, SABAH
ALMASMARY, HANA ALMASMARI,
MOUNIRA ATIK, WALID
JAMMOUL, NAGI ALGAHAIM,
KOKAB ALGAZALI, SHAIKA
SHAGERA, HEND ALSHAWISH,
YUSRA AL SOUFI, HASAN AL-
AHMED, and SALHA AL-TALAQANI,
on behalf of themselves and others
similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of
the United States, U.S.
DEPARTMENT OF
HOMELAND SECURITY
(“DHS”), U.S. CUSTOMS AND
BORDER PROTECTION
(“CBP”), JOHN KELLY,
Secretary of DHS, KEVIN K.
MCALEENAN, Acting
Commissioner of CBP,

Defendants.

Case No. 2:17-cv-10310-VAR-SDD

Hon. Victoria A. Roberts
Mag.: Stephanie D. Davis

PLAINTIFFS’ NOTICE OF INTENT TO FILE AMENDED COMPLAINT

After numerous delays, on March 6, 2017, President Donald J. Trump rescinded Executive Order 13769, and issued a new Executive Order as a replacement (the “Revised Executive Order”). Plaintiffs are currently reviewing the Revised Executive Order, which by its terms will be effective on March 16, 2017. As a result of this new action by the President, Plaintiffs intend to file a Motion for Leave to File a Second Amended Complaint, accompanied by a Second Amended Complaint. Plaintiffs will make this filing on March 16, 2017 (i.e., the effective date of the Revised Executive Order).

Respectfully submitted,

Attorneys for Arab American Civil Rights League, Samir Almasmari, Sabah Almasmary, Hana Almasmari, Mounira Atik, Walid Jammoul, Nagi Algahaim, Kokab Algazali, Shaika Shagera, Hend Alshawish and Yusra Al Soufi:

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

Nabih H. Ayad (P59518)
Attorney for Plaintiffs
645 Griswold St., Ste. 2202
Detroit, MI 48226
(313) 983-4600
nayad@ayadlaw.com

FARHAT & ASSOCIATES, PLLC

/s/ Helal Farhat

Helal Farhat (P64872)
Counsel for the Arab American
Chamber of Commerce
6053 Chase Rd.
Dearborn, MI 48126
(313) 945-5100
hfarhat@saflegal.com

HAMMOUD, DAKHLALLAH &
ASSOCIATES, PLLC

/s/ Kassem M. Dakhllallah

Kassem Dakhllallah (P70842)
Co-Counsel for ACRL
6050 Greenfield Rd., Suite 201
Dearborn, MI 48126
(313) 551-3038
kd@hdalawgroup.com

/s/ Nida Samona

Nida Samona (P45356)
Counsel for the Arab Chaldean
Council (“ACC”)
363 W. Big Beaver Rd., Suite 300
Troy, MI 48084
Nidas@myacc.org

/s/ Ali K. Hammoud

Ali K. Hammoud (P73076)
Counsel for Yemini American
Benevolent Association (“YABA”)
6050 Greenfield Rd., Suite 201
Dearborn, MI 48126
(313) 551-3038
ah@hdalawgroup.com

/s/ Rula Aoun

Rula Aoun (P79119)
Co-Counsel for ACRL
4917 Schaefer Rd.
Dearborn, MI 48126
rula@acrlmich.org

VIDA LAW GROUP, PLLC

/s/ Mona Fadlallah

/s/ Natalie C. Qandah

Mona Fadlallah (P64197)
Natalie C. Qandah (P58434)
Co-Counsel for Arab American Civil
Rights League (“ACRL”)

43050 Ford Road, Suite 160
Canton, MI 48187
Phone: (734) 456-9004
Facsimile: (734) 456-9003
Mona@vidalawpllc.com
Natalie@vidalawpllc.com

Attorneys for Hasan Al-Ahmed and Sahla Al-Talaqani:

/s/ Miriam Aukerman

Miriam Aukerman (P63165)
American Civil Liberties Union Fund of
Michigan
1514 Wealthy SE, Suite 242
Grand Rapids, MI 49506
(616) 301-0930
maukerman@aclumich.org

/s/ Samuel R. Bagenstos

Samuel R. Bagenstos (P73971)
Cooperating Attorney,
American Civil Liberties Union
Fund of Michigan
625 South State Street
Ann Arbor, Michigan 48109
(734) 647-7584
sbagen@gmail.com
Application for admission to the
U.S. District Court for the Eastern
District of Michigan forthcoming

/s/ Michael J. Steinberg

Michael J. Steinberg (P43085)
Kary L. Moss (P49759)
American Civil Liberties Union Fund of
Michigan
2966 Woodward Avenue
Detroit, MI 48201
(734) 578-6814
msteinberg@aclumich.org

/s/ Margo Schlanger

Margo Schlanger (N.Y. Bar
#2704443 (3d Dept))
Cooperating Attorney,
American Civil Liberties Union
Fund of Michigan
625 South State Street
Ann Arbor, Michigan 48109
(734) 615-2618
margo.schlanger@gmail.com
Application for admission to the
U.S. District Court for the Eastern
District of Michigan pending

/s/ Jason C. Raofield

Jason C. Raofield (D.C. Bar #463877)
Covington & Burling LLP
One CityCenter
850 10th Street, NW
Washington, D.C. 20001
(202) 662-5072
Email: jraofield@cov.com

Dated: March 6, 2017

CERTIFICATE OF SERVICE

I certify that on March 6, 2017, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Michigan using the CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ Rula Aoun

Rula Aoun (P79119)
Arab American Civil Rights League
4917 Schaefer Rd, Suite 209
Dearborn, MI 48126
(313) 633-0231
rula@acrlmich.org