

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ARAB AMERICAN CIVIL
RIGHTS LEAGUE, et al.,

Plaintiffs,

Civil No. 17-10310

Hon. VICTORIA A. ROBERTS

v.

Mag. Judge Stephanie Dawkins Davis

DONALD TRUMP, et al.,

Defendants.

**STIPULATED MOTION REQUESTING
LEAVE TO EXCEED PAGE LIMITATIONS**

The Plaintiffs and Defendants (hereinafter, “the Parties”), by and through counsel, hereby move under L.R. 7.1(d)(3)(A) for leave to file a brief in support of their Motion to Dismiss that exceeds the 25-page limit. The parties seek to file Motion to Dismiss briefing that is 35 pages, which is warranted given the complexity of the legal issues involved in this action and the significance of the issues that are addressed.

In support of this request, the Defendants state the following:

- (1) Local Rule 7.1(d)(3)(A) generally provides for a 25-page limit for motions to dismiss. However, the Rule also provides that a party “seeking to file a longer brief may apply ex parte in writing setting forth the reasons.” L.R.

7.1(d)(3)(A).

- (2) The case presents an atypical situation in that Plaintiffs have filed a Second Amended Complaint that is over 100 pages, and includes additional claims and Plaintiffs not included in the first Complaint. Additionally, the Second Amended Complaint raises statutory and constitutional issues which are complex and of significant importance as they relate to whether an Executive Order with national security objectives and global effect may be enjoined nationwide.
- (3) Consequently, in order to fully respond to all allegation and claims in the Second Amended Complaint in their Motion to Dismiss, Defendants have need of a moderate extension of the length of their brief.
- (4) Plaintiffs in turn find need to exceed the page limitation by a similar length to fully respond to all arguments raised in Defendants' Motion to Dismiss.
- (5) On April 12, 2017, counsel for the Parties discussed this extension of the page limit telephonically and via electronic mail, and agreed that a 10-page extension of the page limit would permit each Party to adequately respond to the other's claims and arguments for dismissal, respectively.
- (6) The Parties submit that this extension request is not for an improper purpose and will not prejudice either side.

For these reasons, the Parties respectfully request that this Court grant their motion for leave to exceed the page limit, permitting Defendants to file a Motion to Dismiss not to exceed 35 pages, and Plaintiffs to file a Response to Defendants' Motion not to exceed 35 pages.

Dated: April 12, 2017

Respectfully Submitted,

CHAD A. READLER
Acting Assistant Attorney General

WILLIAM C. PEACHEY
Director

GISELA A. WESTWATER
Assistant Director

/s/ Joshua S. Press
JOSHUA S. PRESS
Trial Attorney
District Court Section
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, DC 200044
Telephone: (202) 305-0106
Facsimile: (202) 305-7000
e-Mail: joshua.press@usdoj.gov

Counsel for Defendants

Counsel for Arab American Civil Rights League

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

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

/s/ Rula Aoun

Rula Aoun (P79119)
4917 Schaefer Rd.
Dearborn, MI 48126
(313) 633-0231
rula@acrlmich.org

HAMMOUD, DAKHLALLAH &
ASSOCIATES, PLLC

/s/ Kassem M. Dakhllallah

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

VIDA LAW GROUP, PLLC

/s/ Mona Fadlallah

/s/ Natalie C. Qandah

Mona Fadlallah (P64197)
Natalie C. Qandah (P58434)
43050 Ford Road, Suite 160
Canton, MI 48187
Phone: (734) 456-9004
Facsimile: (734) 456-9003
Mona@vidalawpllc.com
Natalie@vidalawpllc.com

Counsel for American Arab Chamber of Commerce

FARHAT & ASSOCIATES, PLLC

/s/ Helal Farhat

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

CERTIFICATION OF SERVICE

I hereby certify that on April 12, 2017, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of the filing to all attorneys of record.

/s/ Joshua S. Press

JOSHUA S. PRESS

Trial Attorney

District Court Section

Office of Immigration Litigation

P.O. Box 868 Ben Franklin Station

Washington, DC 200044

Telephone: (202) 305-0106

Facsimile: (202) 305-7000

e-Mail: joshua.press@usdoj.gov

Counsel for Defendants