

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

IRANIAN ALLIANCES ACROSS BORDERS;  
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; et al.

Defendants.

Civil Action No.: 17-CV-2921  
Judge Chuang

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs 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 a Preliminary Injunction and supporting exhibits,<sup>1</sup> and the Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction filed today, October 6, 2017, in *Int'l Refugee Assist. Project v. Trump*, No. 8:17-cv-00361 (collectively, the "Memoranda"). Fed. R. Civ. P. 65. Plaintiffs seek to restrain and enjoin Defendants from enforcing or implementing the proclamation entitled "Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats" (the "Proclamation"). As demonstrated in the Memoranda, the Proclamation and Defendants' implementation of it violate the Immigration and Nationality Act and its implementing regulations and the First and Fifth Amendments to the U.S. Constitution.

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<sup>1</sup> Certain exhibits are redacted to protect the identity of Doe Plaintiffs who filed a Motion for Permission to Proceed under Pseudonyms. ECF No. 6 (filed Oct. 3, 2017).

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

A proposed Order is attached.

Dated: October 6, 2017

Respectfully submitted,

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\* *Pro hac vice* applications pending.

\*\* *Pro hac vice* application forthcoming.

^ Admitted only in New York; supervised by Richard B. Katskee, a member of the D.C. Bar.

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 6, 2017, a copy of the foregoing document and its attachments was served on counsel for Defendants, via CM/ECF.

/s/  
Mark H. Lynch (Bar # 12560)