

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION

EBLAL ZAKZOK, SUMAYA  
HAMADMAD, FAHED MUQBIL,  
JOHN DOE #1, and JANE DOES #2-3,

*Plaintiffs,*

v.

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

*Defendants.*

Civil Action No.:

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs hereby move for a preliminary injunction for the reasons set forth in (i) the accompanying complaint, filed on October 6, 2017, in the above-captioned action; (ii) the Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction and supporting exhibits, filed on October 6, 2017, in *Iranian Alliances Across Borders v. Trump*, No. 8:17-cv-02921-TDC; (iii) the Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction, filed on October 6, 2017, in *Int'l Refugee Assist. Project v. Trump*, No. 8:17-cv-00361; and, if given leave to file by the Court,<sup>1</sup> (iv) the supplemental memorandum to be filed by Plaintiffs in the above-captioned action on October 10, 2017, setting forth the particular factual circumstances entitling Plaintiffs to relief. 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

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<sup>1</sup> Plaintiffs are filing, contemporaneously with this Motion, a letter to the Court requesting such supplemental briefing.

Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats” (the “Proclamation”). As demonstrated in the complaint and memoranda of law referenced above, the Proclamation and Defendants’ implementation of the Proclamation violate the Immigration and Nationality Act and its implementing regulations, the Administrative Procedure Act, and the First Amendment to the United States Constitution. Plaintiffs will suffer tangible and irreparable harm if the Proclamation is implemented, as detailed in the accompanying complaint and the forthcoming supplemental memorandum referenced above.

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,

/s/ Charles E. Davidow

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**[PROPOSED] ORDER**

Upon full consideration of Plaintiffs' Motion for a Preliminary Injunction, it is hereby ORDERED that said Motion is GRANTED. Defendants are enjoined from:

- a. Enforcing the "Presidential Proclamation Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry Into the United States by Terrorists or Other Public-Safety Threats" (the "Proclamation");
- b. Applying the Proclamation to deny, revoke, restrict, cancel, or delay issuance of any immigrant or nonimmigrant visa;
- c. Applying the Proclamation to deny or suspend entry or admission of any person;
- d. Applying the Proclamation to prohibit any person from applying for or receiving any benefit under the Immigration and Nationality Act.

So Ordered.

Signed this \_\_\_ day of \_\_\_\_\_, 2017.

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