

17-2231 (L), 17-2232, 17-2233, 17-2240 (Consolidated)

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, *et al.*
Plaintiffs-Appellees,

and

ALLAN HAKKY and SAMANEH TAKALOO
Plaintiffs,

v.

DONALD TRUMP, *et al.*
Defendants-Appellants

On Appeal from the United States District Court for the District of Maryland

**MOTION FOR LEAVE OF MASSACHUSETTS TECHNOLOGY
LEADERSHIP COUNCIL, INC., TO FILE AMICUS BRIEF IN SUPPORT
OF PLAINTIFFS-APPELLEES' RESPONSE BRIEF**

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Pursuant to the Court's October 31, 2017 and November 22, 2017 Orders, Massachusetts Technology Leadership Council, Inc., (MassTLC), respectfully moves this Court for leave to file its proposed *amicus curiae* brief in support of the Plaintiffs. (On November 17, 2017, MassTLC previously requested leave to file its proposed *amicus curiae* brief, but the Court subsequently requested that MassTLC re-file its motion in order to cure a filing defect with regard to an attached addendum.)

Appellees have consented to the filing of this amicus brief. Appellants take no position on this motion.

In support of this motion, MassTLC states that it is an association of companies that collectively employ more than 170,000 people in the Massachusetts technology industry. MassTLC represents a vibrant and growing community of innovators in fields including the software, computers, robotics, and security products. MassTLC therefore closely follows issues—including immigration policy—that may affect the ability of its members to build value, attract talent, and compete in the diverse global marketplace.

MassTLC submits this amicus in order to explain that the President's revised travel ban is not only unlawful, but also harmful to the technology sector generally and in Massachusetts specifically, and that restraint of that travel ban is therefore

in the public interest. MassTLC respectfully submits that its proposed amicus brief contains argument and analysis that will assist in a case of general public interest and supplement the efforts of counsel, and that the Court should therefore exercise its discretion to allow the proposed brief to be filed.

Accordingly, for the foregoing reasons, MassTLC respectfully requests that the Court grant this Motion and accept its *amicus curiae* brief.

Dated: Washington, D.C., November 28, 2017

/s/ Gare A. Smith

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CERTIFICATE OF SERVICE

I certify that on November 28, 2017, the foregoing motion was served on all interested parties or their counsel of record through the CM/ECF system.

/s/ Gare Smith

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