

No. 17-1351

---

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

---

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, ET AL.,

*Plaintiffs-Appellees,*

v.

DONALD J. TRUMP, ET AL.,

*Defendants-Appellants.*

---

On Appeal from the United States District Court  
for the District of Maryland, No. 17-cv-00361 (Chuang, J.)

---

**UNOPPOSED MOTION FOR LEAVE TO FILE AMICUS BRIEF ON BEHALF OF  
MUSLIM RIGHTS, PROFESSIONAL AND PUBLIC HEALTH ORGANIZATIONS IN  
SUPPORT OF APPELLEES, IN OPPOSITION TO APPELLANTS' MOTION FOR A  
STAY AND ON THE MERITS**

---

Farhana Khera  
Johnathan J. Smith  
Aziz Huq  
MUSLIM ADVOCATES  
P.O. Box 71080  
Oakland, CA 94612  
(415) 692-1484

Robert A. DeRise  
ARNOLD & PORTER KAYE  
SCHOLER LLP  
601 Massachusetts Ave, NW  
Washington, DC 20001  
(202) 942-5000

Anton Ware  
ARNOLD & PORTER KAYE  
SCHOLER LLP  
Three Embarcadero Center  
10th Floor  
San Francisco, CA 94111-4024  
(415) 471-3100

*Attorneys for Amici Curiae*

April 19, 2017

---

**UNOPPOSED MOTION FOR LEAVE TO FILE AMICUS BRIEF IN  
SUPPORT OF APPELLEES, IN OPPOSITION TO APPELLANTS'  
MOTION FOR A STAY AND ON THE MERITS**

On behalf of Muslim Advocates, American Muslim Health Professionals, Muppies, Inc., the National Arab American Medical Association, and the Network of Arab-American Professionals, we seek the Court's permission to file a brief of amici curiae in support of Appellees, in opposition to Appellants' motion for a stay and on the merits. The parties consent to the filing of the proposed amici curiae brief, which accompanies this motion.

1. Amici are business, education, finance, healthcare, legal, science, technology, and other professional members of the American Muslim community directly harmed and stigmatized by the Executive Order. The proposed Amici Curiae provide the Court with a valuable perspective: the perspective of those members of the community most affected and harmed by the Executive Order.

2. Muslim Advocates, a national legal advocacy and educational organization formed in 2005, works on the frontlines of civil rights to guarantee freedom and justice for Americans of all faiths. Muslim Advocates advances these objectives through litigation and other legal advocacy, policy engagement, and civic education. Muslim Advocates also serves as a legal resource for the American Muslim community, promoting the full and meaningful participation of Muslims in American public life. The issues at stake in this case directly relate to

Muslim Advocates’ work fighting institutional discrimination against the American Muslim community.

3. American Muslim Health Professionals (“AMHP”) works to improve the health of Americans. AMHP has three areas of focus: (1) health promotion and education; (2) professional development; and (3) state and national advocacy on public health issues. AMHP has been a leader in expanding healthcare coverage by hiring a team of state liaisons and working with interfaith communities through its “Connecting Americans to Coverage” campaign. AMHP has spearheaded many social justice initiatives including “EnabledMuslim,” an online platform that provides spiritual and social support for individuals and families impacted by disability. Its leadership also has been at the forefront of raising awareness about bullying, identity development, and other mental health issues impacting the most vulnerable segments of society—our children and youth.

4. Muppies, Inc., also known as Muslim Urban Professionals (“Muppies”), is a nonprofit, charitable organization dedicated to empowering and advancing Muslim business professionals to be leaders in their careers and communities. Its mission is to create a global community of diverse individuals who will support, challenge, and inspire one another by providing a platform for networking, mentorship, and career development. Muppies members are leaders in the fields of finance, consulting, technology, venture capital, healthcare, entrepreneurship and social enterprise. As a condition of acceptance to the organization, members must

demonstrate dedication to the development and advancement of themselves and their communities, in addition to outstanding professional achievement. Muppies members contribute to the fabric of the U.S. economy in diverse ways, such as driving innovation, creating new opportunities for employment, and promoting excellence through diversity and inclusion.

5. The National Arab American Medical Association (“NAAMA”) is the largest international organization of Arab American health care providers, trainees and medical students based in North America. Since its founding, twenty-seven chapters have been established in the United States and Canada. Members of the association include well-trained clinicians, high-ranking university professors, leaders of several medical societies, and scientists involved in cutting edge research and innovation. In the United States, the foundation supports professional and educational activities aimed at Arab American health education and disease prevention in cooperation with community-based organizations. Members have also donated their time and money to help the relief efforts following Hurricanes Katrina and Rita. Currently, volunteers from the association conduct periodic missions to countries surrounding Syria to provide humanitarian medical care and establish eye care and dental clinics to benefit local populations and refugees.

6. Network of Arab-American Professionals (“NAAP”) is a professional organization grounded in the notion that all Arabs in America need to connect to advance the community. Through collective contribution to strengthen our

individual and community standing, NAAP provides a channel for Arab-Americans to realize their passions and pursue their interests through community involvement. NAAP promotes professional networking and social interaction among Arab-American and Arab professionals in the United States and abroad; educates both the Arab-American and non-Arab communities about Arab culture, identity, and concerns; advances the Arab-American community by empowering, protecting and promoting its political causes and interests in the United States and abroad within all levels of society; supports the Arab student movement in the United States; and serves society through volunteerism and community service efforts.

7. The accompanying proposed brief complies with the type-volume limitations for an amicus brief on the merits, because it contains less than half of the 13,000 words allotted for Appellants' opening brief during the Court's initial consideration of the case on the merits and consideration of stay. *See* Fed. R. App. P. 29(a)(1), (5); 32(a)(7)(B)(i).

8. All parties consent to filing of the proposed amicus brief.

## CONCLUSION

For the foregoing reasons, proposed Amici Curiae respectfully request the Court's permission to file the accompanying brief.

Date: April 19, 2017

/s/ Robert A. DeRise

### MUSLIM ADVOCATES

Farhana Khera  
Johnathan J. Smith  
Aziz Huq  
P.O. Box 71080  
Oakland, CA 94612  
(415) 692-1484

### ARNOLD & PORTER KAYE SCHOLER LLP

Robert A. DeRise  
Bethan R. Jones  
601 Massachusetts Ave, NW  
Washington, DC 20001  
(202) 942-5000

Anton Ware  
Three Embarcadero Center  
10th Floor  
San Francisco, CA 94111  
(415) 471-3100

Andrew D. Bergman  
700 Louisiana Street  
Suite 1600  
Houston, TX 77002  
(713) 576 2430

Clara Wang  
250 West 55th Street  
New York, New York 10019  
(212) 836 6546

*Attorneys for Amici Curiae*

## **CERTIFICATE OF COMPLIANCE**

This motion complies with the type-volume limits because it contains 842 words, excluding the parts exempted by Rule 32(f). This motion complies with the typeface and type-style requirements because it was prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman.

April 19, 2017

/s/ Robert A. DeRise  
Robert A. DeRise

*Attorney for Amici Curiae*

## **CERTIFICATE OF SERVICE**

I certify that on April 19, 2017, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Appeals for the Fourth Circuit by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users, and service will be accomplished by the appellate CM/ECF system.

April 19, 2017

/s/ Robert A. DeRise  
Robert A. DeRise

*Attorney for Amici Curiae*