

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

No. 17-1351

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban Justice Center, Inc., on behalf of itself; HIAS, INC., on behalf of itself and its clients; MIDDLE EAST STUDIES ASSOCIATION OF NORTH AMERICA, INC., on behalf of itself and its members; MUHAMMED METEAB; PAUL HARRISON; IBRAHIM AHMED MOHOMED; JOHN DOES #1 & 3; JANE DOE #2

Plaintiffs – Appellees,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; DEPARTMENT OF HOMELAND SECURITY; DEPARTMENT OF STATE; OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE; JOHN F. KELLY, in his official capacity as Secretary of Homeland Security; REX W. TILLERSON, in his official capacity as Secretary of State; DANIEL R. COATS, in his official capacity as Director of National Intelligence

Defendants – Appellants.

On Appeal from the United States District Court, District of Maryland,
The Honorable Theodore D. Chuang, United States District Judge
(8:17-cv-00361-TDC)

**CONSENT MOTION FOR LEAVE TO FILE ATTACHMENTS TO BRIEF OF
AMICI CURIAE AIRPORT ATTORNEYS COALITION**

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**CONSENT MOTION FOR LEAVE TO FILE ATTACHMENTS TO BRIEF
OF AMICI CURIAE AIRPORT ATTORNEYS COALITION**

Upon consent of all parties, the undersigned members of the *amici curiae* Airport Attorneys Coalition respectfully move this Court for leave to file attachments to their *amici curiae* brief filed separately with this Court. In support of this motion, *amici* state as follows:

1. All parties have consented to the filing of the brief of the *amici curiae* and its supporting attachments.

2. *Amici* are attorneys representing a range of legal backgrounds, specialties, and United States jurisdictions who gathered at international airports across the country to assist disenfranchised travelers affected by the travel bans. Proposed *amici* have on-the-ground, first-hand experience with the legal chaos created by the implementation of the bans and their continuing effects on clients and travelers here and abroad. Proposed *amici* are familiar with the practical consequences of the ban to our clients and the practice of immigration law generally.

3. *Amici* request leave from this Court to file a series of supporting attachments to their brief. Such support includes various declarations from the *amici* describing their first-hand observations and experiences at the airports as they attempted to assist clients and travelers impacted by the travel bans. The declarations detail how the travels bans have affected the ability of *amici* to

effectively assist and counsel their clients. The attachments also include a list of all *amici* and a letter of signatories in support of the brief. This motion is accompanied by all supporting attachments.

4. The attachments will provide the Court with useful, relevant facts and insight into the critical legal issues presented in this case.

For the foregoing reasons, *amici* respectfully request permission to file attachments to their brief *amici curiae* in support of Plaintiffs-Appellees.

Dated: April 19, 2017

By: /s/ Michael B. Roberts
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CERTIFICATE OF CONFERENCE

The undersigned counsel certifies that Reed Smith LLP has obtained consent to this motion from the parties in this case. Specifically, Ms. Swingle of the Department of Justice and Mr. Amdur of the ACLU both stated they would accept all timely filed amicus briefs when asked for their clients' position as to the filing of the proposed amicus brief.

Dated: April 19, 2017

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CERTIFICATE OF SERVICE

I certify that on this 19th day of April, 2017, I served the foregoing Motion for Leave to File Brief as *Amici Curiae* in Support of Appellees via the Court's ECF system upon all counsel.

Dated: April 19, 2017

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CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(a)(G)(1)), the undersigned counsel certifies that this motion:

(i) complies with the type-volume limit of Fed. R. App. P. 27(a)(2)(B) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 294 words.

(ii) complies with the typeface requirements of Rule 32(a)(5) and the type style requirements of Rule 32(a)(6) because it has been prepared using Microsoft Office Word and is set in Times New Roman font in a size equivalent to 14 points or larger.

Dated: April 19, 2017

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