

No. 17-1351

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

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INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban  
Justice Center, Inc., et al.,  
Plaintiffs-Appellees,

v.

DONALD TRUMP, President of the United States, et al.,  
Defendant-Appellants.

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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**MOTION FOR LEAVE TO FILE BRIEF OF *AMICI CURIAE*  
IMMIGRATION LAW SCHOLARS AND CLINICIANS  
ON STATUTORY CLAIMS  
IN SUPPORT OF PLAINTIFFS-APPELLEES**

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Undersigned law professors and law school clinicians respectfully move this Court for permission to file an *amici curiae* brief in support of Plaintiffs. In support of this motion, proposed *amici* state as follows:

1. Proposed *amici* are immigration professors and clinicians at law schools. Amici have personal, professional, and academic connections to individuals impacted by Executive Order 13780 (Mar. 6, 2017) (“EO”). In addition, as scholars and practitioners of immigration law, they have an interest in ensuring correct and just interpretations of the Immigration and Nationality Act (“INA”).
2. Immigration clinics—and attorneys within those clinics—have had direct experiences with clients, students, and faculty who have sought their assistance with immigration concerns resulting from the Executive Orders barring entry to individuals from certain countries. Immigration clinics worked hard to assist individuals detained at airports and stranded abroad amidst confusion after Executive Order 13769 (Jan. 17, 2017) was issued. They continue to provide legal advice, conduct community workshops, undertake research, and represent clients affected by the EO.
3. Proposed *amici* are vitally interested in protecting the rights of their students, colleagues, and clients, whose status in the United States is jeopardized by the EO.

4. All parties have consented to the filing of this amicus brief.

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

DATED: April 21, 2017

Respectfully submitted,

/s/ Fatma E. Marouf

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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2017, I electronically filed the foregoing with the Clerk of the court for the United States Court of Appeals for the Fourth Circuit using the appellate CM/ECF system.

I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

DATED: April 21, 2017

Respectfully submitted,

/s/ Fatma E. Marouf

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Fatma E. Marouf