

---

---

**Nos. 17-2231 (L), 17-2232, 17-2233, 17-2240 (Consolidated)**

---

---

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

---

No. 17-2331 (L)

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

v.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, et al.  
*Defendants-Appellants*

---

On Appeal from the United States District Court  
For the District of Maryland  
(Hon. Theodore D. Chuang, United States District Judge)  
[Caption Continues on Inside Cover]

---

**UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF *AMICUS  
CURIAE* FOR THE AMERICAN-ARAB ANTI-DISCRIMINATION  
COMMITTEE IN SUPPORT OF PLAINTIFFS-APPELLEES**

---

Abed A. Ayoub  
Samer E. Khalaf  
Yolanda C. Rondon  
Anton G. Hajjar  
AMERICAN-ARAB ANTI-  
DISCRIMINATION COMMITTEE  
1705 DeSales St. NW, Suite 500  
Washington, DC 20036  
(202) 244-2990  
aayoub@adc.org

Christopher J. Wright  
*Counsel of Record*  
E. Austin Bonner  
Adrienne E. Fowler  
Harris, Wiltshire & Grannis LLP  
1919 M Street NW, Eighth Floor  
Washington, DC 20036  
(202) 730-1300  
cwright@hwglaw.com

*Counsel for Amicus Curiae*

---

---

---

No. 17-2232  
IRANIAN ALLIANCES ACROSS BORDERS, et al.  
*Plaintiffs-Appellees,*

v.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, et al.  
*Defendants-Appellants*

---

On Appeal from the United States District Court  
For the District of Maryland  
(Hon. Theodore D. Chuang, United States District Judge)  
(8:17-cv-020921-TDC)

---

No. 17-2233  
EBLAL ZAKZOK, et al.  
*Plaintiffs-Appellees,*

v.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, et al.  
*Defendants-Appellants*

---

On Appeal from the United States District Court  
For the District of Maryland  
(Hon. Theodore D. Chuang, United States District Judge)  
(1:17-cv-2969-TDC)

---

No. 17-2240  
INTERNATIONAL REFUGEE ASSISTANCE PROJECT, et al.  
*Plaintiffs-Appellees,*

v.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, et al.  
*Defendants-Appellants*

---

On Appeal from the United States District Court  
For the District of Maryland  
(Hon. Theodore D. Chuang, United States District Judge)  
(8:17-cv-361-TDC)

## **UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF AMICUS CURIAE**

The American-Arab Anti-Discrimination Committee (ADC) respectfully moves for leave to file a brief as amicus curiae in support of appellees. The parties consent to the proposed amicus brief, which accompanies this motion.

ADC is a nonprofit, grassroots civil rights organization committed to defending the rights of people of Arab descent and promoting their rich cultural heritage. Founded in 1980 by U.S. Senator James Abourezk, ADC is non-sectarian and non-partisan. With members from all fifty states and chapters nationwide, it is the largest Arab-American grassroots organization in the United States. ADC protects the Arab-American and immigrant communities against discrimination, racism, and stereotyping, and it vigorously advocates for immigrant and civil rights, including individuals whom Presidential Proclamation 9645—the subject of this litigation—substantially impacts. ADC’s proposed brief is desirable and relevant to the disposition of the case because it provides the Court with additional information regarding the import of the President’s motives in promulgating Presidential Proclamation 9645 and legal frameworks the Court may use to analyze those motives.

Abed A. Ayoub  
Samer E. Khalaf  
Yolanda C. Rondon  
Anton G. Hajjar  
AMERICAN-ARAB ANTI-  
DISCRIMINATION COMMITTEE  
1705 DeSales St. NW, Suite 500  
Washington, DC 20036  
(202) 244-2990  
aayoub@adc.org

Respectfully submitted,

/s/ Christopher J. Wright  
Christopher J. Wright  
*Counsel of Record*  
E. Austin Bonner  
Adrienne E. Fowler  
Harris, Wiltshire & Grannis LLP  
1919 M Street NW, Eighth Floor  
Washington, DC 20036  
(202) 730-1300  
cwright@hwglaw.com

*Counsel for Amicus Curiae*

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2017, I electronically filed the foregoing document and all its attachments 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.

/s/ Christopher J. Wright

**UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT**  
**Effective 12/01/2016**

No. 17-2231      **Caption:** IRAP et al. v. Trump et al.

**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT**  
Type-Volume Limit, Typeface Requirements, and Type-Style Requirements

**Type-Volume Limit for Briefs:** Appellant's Opening Brief, Appellee's Response Brief, and Appellant's Response/Reply Brief may not exceed 13,000 words or 1,300 lines. Appellee's Opening/Response Brief may not exceed 15,300 words or 1,500 lines. A Reply or Amicus Brief may not exceed 6,500 words or 650 lines. Amicus Brief in support of an Opening/Response Brief may not exceed 7,650 words. Amicus Brief filed during consideration of petition for rehearing may not exceed 2,600 words. Counsel may rely on the word or line count of the word processing program used to prepare the document. The word-processing program must be set to include headings, footnotes, and quotes in the count. Line count is used only with monospaced type. See Fed. R. App. P. 28.1(e), 29(a)(5), 32(a)(7)(B) & 32(f).

**Type-Volume Limit for Other Documents if Produced Using a Computer:** Petition for permission to appeal and a motion or response thereto may not exceed 5,200 words. Reply to a motion may not exceed 2,600 words. Petition for writ of mandamus or prohibition or other extraordinary writ may not exceed 7,800 words. Petition for rehearing or rehearing en banc may not exceed 3,900 words. Fed. R. App. P. 5(c)(1), 21(d), 27(d)(2), 35(b)(2) & 40(b)(1).

**Typeface and Type Style Requirements:** A proportionally spaced typeface (such as Times New Roman) must include serifs and must be 14-point or larger. A monospaced typeface (such as Courier New) must be 12-point or larger (at least 10½ characters per inch). Fed. R. App. P. 32(a)(5), 32(a)(6).

This brief or other document complies with type-volume limits because, excluding the parts of the document exempted by Fed. R. App. P. 32(f) (cover page, disclosure statement, table of contents, table of citations, statement regarding oral argument, signature block, certificates of counsel, addendum, attachments):

- this brief or other document contains 167 [state number of] words
- this brief uses monospaced type and contains \_\_\_\_\_ [state number of] lines

This brief or other document complies with the typeface and type style requirements because:

- this brief or other document has been prepared in a proportionally spaced typeface using Microsoft Word \_\_\_\_\_ [identify word processing program] in Century Schoolbook, 14 pt. \_\_\_\_\_ [identify font size and type style]; **or**
- this brief or other document has been prepared in a monospaced typeface using \_\_\_\_\_ [identify word processing program] in \_\_\_\_\_ [identify font size and type style].

(s) Christopher J. Wright

Party Name American-Arab Anti-Discrimination

Dated: 11/17/2017