

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

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IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

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

and

ALLAN HAKKY and SAMANEH TAKALOO  
Plaintiffs,

v.

DONALD TRUMP, et al.  
Defendants-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 OF MASSACHUSETTS TECHNOLOGY  
LEADERSHIP COUNCIL, INC., TO FILE AMICUS BRIEF IN SUPPORT  
OF PLAINTIFFS-APPELLEES' RESPONSE BRIEF**

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Gare A. Smith  
Michael B. Keating  
Kristyn M. DeFilipp  
Christopher E. Hart  
Daniel L. McFadden  
FOLEY HOAG LLP  
1717 K Street NW  
Washington, D.C. 20006

Attorneys for Amicus Curiae MASSACHUSETTS TECHNOLOGY  
LEADERSHIP COUNCIL, INC.

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

GARE SMITH  
MICHAEL B. KEATING  
KRISTYN DeFILIPP  
CHRISTOPHER E. HART  
DANIEL L. McFADDEN  
FOLEY HOAG LLP  
1717 K Street NW  
Washington, D.C. 20006

Attorneys for Amicus Curiae  
MASSACHUSETTS TECHNOLOGY  
LEADERSHIP COUNCIL, INC.

**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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GARE SMITH

MICHAEL B. KEATING

KRISTYN DeFILIPP

CHRISTOPHER E. HART

DANIEL L. McFADDEN

FOLEY HOAG LLP

1717 K Street NW

Washington, D.C. 20006

Attorneys for Amicus Curiae

MASSACHUSETTS TECHNOLOGY

LEADERSHIP COUNCIL, INC.