

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

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

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

and

ALLAN HAKKY and SAMANEH TAKALOO
Plaintiffs,

v.

DONALD TRUMP, et al.
Defendants-Appellants

On Appeal from the United States District Court for the District of Maryland

**MOTION FOR LEAVE OF MASSACHUSETTS TECHNOLOGY
LEADERSHIP COUNCIL, INC., TO FILE AN ADDENDUM TO ITS
AMICUS BRIEF IN SUPPORT OF PLAINTIFFS-APPELLEES'
RESPONSE BRIEF**

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 Local Rule 28(b) and this Court's November 22, 2017 Order, Massachusetts Technology Leadership Council, Inc., (MassTLC) respectfully moves this Court for leave to file an addendum to its proposed amicus curiae brief in support of the Plaintiffs.

On November 17, 2017, MassTLC previously requested leave to file a proposed amicus curiae brief which included the attached addendum, but the Court subsequently requested that MassTLC specifically request leave to file the attached as an addendum.

Appellees have consented to the filing of this document. 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.

The addendum is a report created by MassTLC in July 2017 to present an analysis of voluminous information relating to the importance of immigration to

the technology sector. The proposed amicus curiae brief substantially refers to the data in this report. MassTLC accordingly seeks to file this report as an addendum for this Court's convenience and reference.

MassTLC further submits its amicus brief 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 both its proposed amicus brief and its report 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 the addendum to 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

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.