

Nos. 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*,

IRANIAN ALLIANCES ACROSS BORDERS, *et al.*,  
*Plaintiffs-Appellees*,

EBLAL ZAKZOK, *et al.*,  
*Plaintiffs-Appellees*,

v.

DONALD J. TRUMP, *et al.*,  
*Defendants-Appellants*.

---

On Appeal from the United States District Court  
for the District of Maryland, Southern Division  
(8:17-cv-00361-TDC)

---

**PLAINTIFFS-APPELLEES' NOTICE REGARDING PLAINTIFFS**

---

Karen C. Tumlin  
Nicholas Espíritu  
Melissa S. Keaney  
Esther Sung  
NATIONAL IMMIGRATION LAW  
CENTER  
3435 Wilshire Boulevard,  
Suite 1600  
Los Angeles, CA 90010  
Tel: (213) 639-3900  
Fax: (213) 639-3911  
tumlin@nilc.org

Omar C. Jadwat  
Lee Gelernt  
Hina Shamsi  
Hugh Handeyside  
Sarah L. Mehta  
David Hausman  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004

*Additional counsel on the next page*

espiritu@nilc.org  
keaney@nilc.org  
sung@nilc.org

Justin B. Cox  
NATIONAL IMMIGRATION LAW  
CENTER  
P.O. Box 170208  
Atlanta, GA 30317  
Tel: (678) 279-5441  
Fax: (213) 639-3911  
cox@nilc.org

Kathryn Claire Meyer  
Mariko Hirose  
INTERNATIONAL REFUGEE ASSISTANCE  
PROJECT  
40 Rector Street, 9th Floor  
New York, New York 10006  
Tel: (646) 459-3044  
Fax: (212) 533-4598  
kmeyer@refugeerights.org  
mhirose@refugeerights.org

David Rocah  
Deborah A. Jeon  
Sonia Kumar  
Nicholas Taichi Steiner  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF MARYLAND  
3600 Clipper Mill Road, Suite 350  
Baltimore, MD 21211  
Tel: (410) 889-8555  
Fax: (410) 366-7838  
jeon@aclu-md.org  
rocah@aclu-md.org  
kumar@aclu-md.org  
steiner@aclu-md.org

Tel: (212) 549-2600  
Fax: (212) 549-2654  
ojadwat@aclu.org  
lgelernt@aclu.org  
hshamsi@aclu.org  
hhandeyside@aclu.org  
smehta@aclu.org  
dhausman@aclu.org

Cecillia D. Wang  
Cody H. Wofsy  
Spencer E. Amdur  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
39 Drumm Street  
San Francisco, CA 94111  
Tel: (415) 343-0770  
Fax: (415) 395-0950  
cwang@aclu.org  
cwofsy@aclu.org  
samdur@aclu.org

David Cole  
Daniel Mach  
Heather L. Weaver  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 15th Street NW  
Washington, D.C. 20005  
Tel: (202) 675-2330  
Fax: (202) 457-0805  
dcole@aclu.org  
dmach@aclu.org  
hweaver@aclu.org

*Additional counsel on the next page*

*Counsel for Plaintiffs-Appellees IRAP, et al.*

Johnathan Smith  
Sirine Shebaya  
MUSLIM ADVOCATES  
P.O. Box 66408  
Washington, D.C. 20035  
Tel: (202) 897-2622  
Fax: (415) 765-1774  
johnathan@muslimadvocates.org  
sirine@muslimadvocates.org

Richard B. Katskee  
Eric Rothschild  
Andrew L. Nellis^  
AMERICANS UNITED FOR SEPARATION  
OF CHURCH AND STATE  
1310 L St. NW, Ste. 200  
Washington, D.C. 20005  
Tel: (202) 466-3234  
Fax: (202) 466-3353  
katskee@au.org  
rothschild@au.org  
nellis@au.org

Mark H. Lynch  
Mark W. Mosier  
Herbert L. Fenster  
Jose E. Arvelo  
John W. Sorrenti  
Katherine E. Cahoy  
Rebecca G. Van Tassell  
Karun Tilak  
COVINGTON & BURLING LLP  
One City Center  
850 10th Street, NW  
Washington, D.C. 20001  
Tel: (202) 662-6000  
Fax: (202) 662-6302  
mlynch@cov.com  
mmosier@cov.com  
hfenster@cov.com  
jarvelo@cov.com  
jsorrenti@cov.com  
kcahoy@cov.com  
rvantassell@cov.com  
ktilak@cov.com

*Counsel for Plaintiffs-Appellees I.A.A.B., et al.*

Robert A. Atkins  
Charles E. Davidow  
Liza Velazquez  
Andrew J. Ehrlich  
Steven C. Herzog  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Tel.: (212) 373-3000  
Fax: (212) 757-3990  
ratkins@paulweiss.com  
lvelazquez@paulweiss.com  
aehrich@paulweiss.com  
sherzog@paulweiss.com

Lena F. Masri  
Gadeir Abbas  
COUNCIL ON AMERICAN-ISLAMIC  
RELATIONS  
453 New Jersey Avenue SE  
Washington, D.C. 20003  
Tel.: (202) 488-8787  
Fax: (202) 488-0833  
lmasri@cair.com  
gabbas@cair.com

*Additional counsel on the next page*

Faiza Patel  
Michael Price  
BRENNAN CENTER FOR JUSTICE  
AT NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
Tel.: (646) 292-8335  
Fax: (212) 463-7308  
faiza.patel@nyu.com  
michael.price@nyu.com

Jethro Eisenstein  
PROFETA & EISENSTEIN  
45 Broadway, Suite 2200  
New York, New York 10006  
Tel.: (212) 577-6500  
Fax: (212) 577-6702  
jethro19@gmail.com

*Counsel for Plaintiffs-Appellees Zakzok, et al.*

^Admitted only in New York; supervised by Richard B. Katskee, a member of the D.C. Bar

Plaintiffs respectfully submit this notice of changed circumstances of which they have become aware since they filed their last brief on November 29, 2017.

The relatives of three individual *IRAP* plaintiffs, Shapour Shirani, Fakhri Ziaolhagh, and Grannaz Amirjamshidi, have been issued visas. *See* J.A. 548-54, 602-07. The visa for *IAAB* plaintiff John Doe No. 6's sister-in-law has been issued, but his mother-in-law's application remains pending. *See* J.A. 1174-76. Similarly, *Zakzok* plaintiff Sumaya Hamadmad's sister has been issued a visa, but her father-in-law's application remains pending. *See* J.A. 1254-58.

The arguments made on page 19 of Plaintiffs' brief citing particular pending visa applications remain amply supported by various plaintiffs' still-pending visa applications. Indeed, that these particular plaintiffs are reunited with their loved ones—or some of their loved ones—thanks to the preliminary injunction underscores the imminence of injury to others similarly situated, including other plaintiffs, and illustrates the importance of injunctive relief for those individuals.

Dated: December 6, 2017

Karen C. Tumlin  
Nicholas Espiritu  
Melissa S. Keaney  
Esther Sung  
NATIONAL IMMIGRATION LAW  
CENTER  
3435 Wilshire Boulevard,

Respectfully submitted,

/s/ Omar C. Jadwat

---

Omar C. Jadwat  
Lee Gelernt  
Hina Shamsi  
Hugh Handeyside  
Sarah L. Mehta  
David Hausman  
AMERICAN CIVIL LIBERTIES

Suite 1600  
Los Angeles, CA 90010  
Tel: (213) 639-3900  
Fax: (213) 639-3911  
tumlin@nilc.org  
espiritu@nilc.org  
keaney@nilc.org  
sung@nilc.org

Justin B. Cox  
NATIONAL IMMIGRATION LAW  
CENTER  
P.O. Box 170208  
Atlanta, GA 30317  
Tel: (678) 279-5441  
Fax: (213) 639-3911  
cox@nilc.org

Kathryn Claire Meyer  
Mariko Hirose  
INTERNATIONAL REFUGEE  
ASSISTANCE PROJECT  
40 Rector Street, 9th Floor  
New York, New York 10006  
Tel: (646) 459-3044  
Fax: (212) 533-4598  
kmeyer@refugeerights.org  
mhirose@refugeerights.org

David Rocah  
Deborah A. Jeon  
Sonia Kumar  
Nicholas Taichi Steiner  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF MARYLAND  
3600 Clipper Mill Road, Suite 350  
Baltimore, MD 21211  
Tel: (410) 889-8555  
Fax: (410) 366-7838

UNION FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel: (212) 549-2600  
Fax: (212) 549-2654  
ojadwat@aclu.org  
lgelernt@aclu.org  
hshamsi@aclu.org  
hhandeyside@aclu.org  
smehta@aclu.org  
dhausman@aclu.org

Cecillia D. Wang  
Cody H. Wofsy  
Spencer E. Amdur  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION  
39 Drumm Street  
San Francisco, CA 94111  
Tel: (415) 343-0770  
Fax: (415) 395-0950  
cwang@aclu.org  
cwofsy@aclu.org  
samdur@aclu.org

David Cole  
Daniel Mach  
Heather L. Weaver  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION  
915 15th Street NW  
Washington, D.C. 20005  
Tel: (202) 675-2330  
Fax: (202) 457-0805  
dcole@aclu.org  
dmach@aclu.org  
hweaver@aclu.org

jeon@aclu-md.org  
rocah@aclu-md.org  
kumar@aclu-md.org  
steiner@aclu-md.org

*Counsel for Plaintiffs-Appellees IRAP, et al.*

Johnathan Smith  
Sirine Shebaya  
MUSLIM ADVOCATES  
P.O. Box 66408  
Washington, D.C. 20035  
Tel: (202) 897-2622  
Fax: (415) 765-1774  
johnathan@muslimadvocates.org  
sirine@muslimadvocates.org

Richard B. Katskee  
Eric Rothschild  
Andrew L. Nellis^  
AMERICANS UNITED FOR  
SEPARATION OF CHURCH AND  
STATE  
1310 L St. NW, Ste. 200  
Washington, D.C. 20005  
Tel: (202) 466-3234  
Fax: (202) 466-3353  
katskee@au.org  
rothschild@au.org  
nellis@au.org

Mark H. Lynch  
Mark W. Mosier  
Herbert L. Fenster  
Jose E. Arvelo  
John W. Sorrenti  
Katherine E. Cahoy  
Rebecca G. Van Tassell  
Karun Tilak  
COVINGTON & BURLING LLP  
One City Center  
850 10th Street, NW  
Washington, D.C. 20001  
Tel: (202) 662-6000  
Fax: (202) 662-6302  
mlynch@cov.com  
mmosier@cov.com  
hfenster@cov.com  
jarvelo@cov.com  
jsorrenti@cov.com  
kcahay@cov.com  
rvantassell@cov.com  
ktilak@cov.com

*Counsel for Plaintiffs-Appellees I.A.A.B., et al.*

Robert A. Atkins  
Charles E. Davidow  
Liza Velazquez  
Andrew J. Ehrlich  
Steven C. Herzog  
PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP

Lena F. Masri  
Gadeir Abbas  
COUNCIL ON AMERICAN-  
ISLAMIC RELATIONS  
453 New Jersey Avenue SE  
Washington, D.C. 20003  
Tel.: (202) 488-8787

1285 Avenue of the Americas  
New York, NY 10019-6064  
Tel.: (212) 373-3000  
Fax: (212) 757-3990  
ratkins@paulweiss.com  
lvelazquez@paulweiss.com  
aehrlich@paulweiss.com  
sherzog@paulweiss.com

Faiza Patel  
Michael Price  
BRENNAN CENTER FOR JUSTICE  
AT NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
Tel.: (646) 292-8335  
Fax: (212) 463-7308  
faiza.patel@nyu.com  
michael.price@nyu.com

Fax: (202) 488-0833  
lmasri@cair.com  
gabbas@cair.com

Jethro Eisenstein  
PROFETA & EISENSTEIN  
45 Broadway, Suite 2200  
New York, New York 10006  
Tel.: (212) 577-6500  
Fax: (212) 577-6702  
jethro19@gmail.com

*Counsel for Plaintiffs-Appellees Zakzok, et al.*

^Admitted only in New York; supervised by Richard B. Katskee, a member of the D.C. Bar



## CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2017, I electronically filed the foregoing brief 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, except for the following, who will be served by first class mail on December 6, 2017:

Hashim M. Mooppan  
U.S. Department of Justice  
Civil Division, Appellate Section  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0000

/s/ Omar C. Jadwat  
Omar C. Jadwat