

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNIVERSAL MUSLIM ASSOCIATION OF AMERICA and JOHN and JANE DOE, Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; U.S. CUSTOMS AND BORDER PROTECTION; U.S. DEPARTMENT OF STATE; U.S. DEPARTMENT OF JUSTICE; JOHN KELLY, in his official capacity as Secretary of the Department of Homeland Security; KEVIN K. MCALEENAN, in his official capacity as Acting Commissioner of U.S. Customs and Border Protection; REX W. TILLERSON, in his official capacity as Secretary of State; and JEFFERSON BEAUREGARD SESSIONS III, in his official capacity as Attorney General of the United States; Defendants.

Civil Action No.: _____

DOE PLAINTIFFS' MOTION FOR LEAVE TO PROCEED UNDER PSEUDONYMS

Plaintiffs John Doe and Jane Doe (collectively, the "Doe Plaintiffs"), by and through their undersigned counsel, respectfully move this Court for entry of an order granting them permission to proceed in this action under pseudonyms. This motion is supported by (i) a Memorandum of Law and (ii) Declarations of each of the Doe Plaintiffs, which are filed and served concurrently with this motion.


The Doe Plaintiffs should be permitted to participate in this litigation under pseudonyms. In this case, Plaintiffs are suing the President of the United States, several members of his Cabinet and federal agencies that control immigration to the United States, to challenge an

Executive Order that would, among other things, block foreign nationals from six majority Muslim countries who do not already have visas from entering the United States. As detailed in the Doe Plaintiffs' Memorandum of Law, if the Doe Plaintiffs are not permitted to proceed using fictitious names, they would not feel safe participating in this lawsuit. Identifying the Doe Plaintiffs would create a substantial risk of retaliatory physical and mental harm both to the Doe Plaintiffs and to their six minor children.

This litigation concerns highly publicized and controversial actions by the President of the United States, his surrogates, and several federal agencies in charge of deciding who gets to enter and remain in this country. The public disclosure of the Doe Plaintiffs' names would expose them to an increased risk of harm across several aspects of their lives. Such harms include threats to the lives of two of their children (who are currently abroad and in the process of trying to escape Yemen), and possible adverse consequences for their entire family, especially for their children who are still attempting to obtain visas to enter the United States. In addition, the Doe Plaintiffs and their children in the United States would be in danger of public hostility and harassment if their identities were disclosed.

For these and other reasons, the Doe Plaintiffs respectfully request that this Court grant their motion to proceed under pseudonyms.

Dated: March 23, 2017

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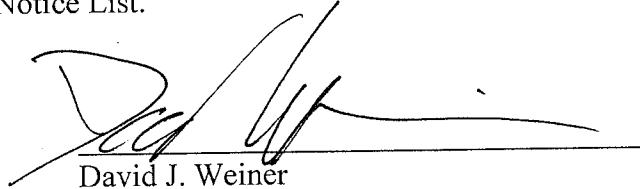
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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

A handwritten signature in black ink, appearing to read 'David J. Weiner', is written over a horizontal line.

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