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*\*Pro Hac Vice Application Pending*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

STATE OF HAWAII and ISMAIL  
ELSHIKH,

Plaintiffs,

vs.

DONALD J. TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; JOHN F.  
KELLY, in his official capacity as  
Secretary of Homeland Security; U.S.  
DEPARTMENT OF STATE; REX  
TILLERSON, in his official capacity as  
Secretary of State; and the UNITED  
STATES OF AMERICA,

Defendants.

CV. No. 1:17-cv-00050-DKW-KJM

**MOTION FOR LEAVE TO FILE  
BRIEF OF *AMICUS CURIAE* T.A.  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR TEMPORARY  
RESTRAINING ORDER;  
APPENDIX "A"; CERTIFICATE  
OF SERVICE**

**MOTION FOR LEAVE TO FILE BRIEF OF *AMICUS CURIAE* T.A. IN  
SUPPORT OF PLAINTIFFS’ MOTION FOR TEMPORARY  
RESTRAINING ORDER**

1. *Amicus* T.A.<sup>1</sup> respectfully moves for leave to file an *amicus curiae* brief in support of Plaintiffs’ Motion for Temporary Restraining Order to enjoin the enforcement of the March 6, 2017 Executive Order entitled “Protecting the Nation from Foreign Terrorist Entry into the United States” (the “Amended Executive Order”). Plaintiffs have consented to the filing of this brief, while Defendants take no position. *Amicus* states as follows:

2. T.A. is a Muslim and United States citizen who was raised in Yemen. T.A.’s father and many members of T.A.’s extended family hold Yemeni passports and reside abroad. They are barred from entering the United States under the Amended Order. T.A. has a direct interest in the outcome of this case.

3. T.A. is concerned about the real-life implications of the Amended Executive Order. T.A. is fundamentally concerned with the interference in familial relations that will result from enforcement of the Amended Executive

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<sup>1</sup> This brief uses initials, rather than T.A.’s full name, to reduce the risk of potential reprisals to T.A. or his family members. *United States v. Doe*, 655 F.2d 920, 922 n.1 (9th Cir. 1981) (Even for a party, “[w]here it is necessary, however, to protect a person from harassment, injury, ridicule or personal embarrassment, courts have permitted the use of pseudonyms.”).



**CONCLUSION**

*Amicus* respectfully request that this Court grant leave to file the *amicus curiae* brief attached hereto.

Dated: Honolulu, Hawaii, March 13, 2017.

/s/ Regan M. Iwao  
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Attorneys for *Amicus Curiae*  
T.A.

*\*Pro Hac Vice Application Pending*