



October 20, 2017

Via ECF

The Honorable Theodore D. Chuang
United States District Court
District of Maryland
6500 Cherrywood Lane
Greenbelt, MD 20770

Re: International Refugee Assistance Project, et al. v. Trump, Case No. 8:17-cv-00361-TDC

Dear Judge Chuang:

Pursuant to § II.A of the Case Management Order, Plaintiffs respectfully inform the Court that they intend to file the attached motion to clarify or modify the preliminary injunction issued by the Court on October 17, 2017. As set forth therein, Plaintiffs respectfully request that the Court clarify that the preliminary injunction protects clients of organizations like IRAP and HIAS whose relationships are “formal, documented, and formed in the ordinary course,” or in the alternative that it modify the injunction to reflect that, while a refugee assurance alone does not bring a refugee within the protection of the injunction, there is no categorical rule barring protection for clients generally.

Plaintiffs have communicated with the other parties in this and related cases regarding their intent to file this motion. The *I.A.A.B.* and *Zakzok* plaintiffs have no objection to this motion. The government indicated that it (1) would oppose Plaintiffs’ filing of any motion to modify the injunction that could potentially interfere with the Fourth Circuit’s jurisdiction over its appeal of the preliminary injunction, and (2) took no position to the extent that Plaintiffs seek only to clarify the injunction (but reserved the right to do so at a later date, depending on the exact nature and content of the motion).

Plaintiffs respectfully request that the Court waive the requirement of a pre-motion conference and instead accept this motion for filing.

Respectfully submitted,

/s/ Omar C. Jadwat
Omar C. Jadwat