IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND SOUTHERN DIVISION

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, et al.,

Civil Action No.: 8:17-CV-00361-TDC

Plaintiffs,

PLAINTIFFS' NOTICE REGARDING PENDING STAY MOTIONS IN RELATED CASES

v.

DONALD TRUMP, et al,

Defendants.

The plaintiffs in *Iranian Alliances Across Borders (IAAB) v. Trump*, No. 17-cv-2921-TDC and *Zakzok v. Trump*, No. 17-cv-2969, which are both pending before this Court, have sought to begin discovery in those cases, and the government has now moved for a stay.

As indicated during the January 5, 2018, telephone conference with the Court, the *IRAP* plaintiffs take no position regarding how to proceed in the other cases. However, should the Court permit discovery to commence in *IAAB* and/or *Zakzok*, the *IRAP* plaintiffs respectfully request that the Court lift the stay in this case so that the *IRAP* plaintiffs are able to participate in discovery on equal terms. Doing so would allow a far more efficient use of the Court's and the parties' resources.

Respectfully submitted,

/s/ Omar C. Jadwat

Omar C. Jadwat†
Lee Gelernt†
Hina Shamsi†
Hugh Handeyside†
Sarah L. Mehta†
David Hausman†
American Civil Libertica

American Civil Liberties 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, DC 20005

Tel: (202) 675-2330 Fax: (202) 457-0805 Dated: February 1, 2018

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

Justin B. Cox (Bar No. 17550) National Immigration Law Center

PO Box 170208 Atlanta, GA 30317 Tel: (678) 279-5441 Fax: (213) 639-3911

cox@nilc.org

Mariko Hirose† Linda Evarts† Kathryn C. Meyer†

International Refugee Assistance Project

40 Rector Street, 9th Floor New York, NY 10006 Tel: (646) 459-3044

mhirose@refugeerights.org levarts@refugeerights.org kmeyer@refugeerights.org dcole@aclu.org dmach@aclu.org hweaver@aclu.org

David Rocah (Bar No. 27315)
Deborah A. Jeon (Bar No. 06905)
Sonia Kumar (Bar No. 07196)
Nicholas Taichi Steiner (Bar
No.19670)
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
steiner@aclu-md.org

†Admitted Pro Hac Vice

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2018, I electronically filed this Notice for Plaintiffs

with the Court Clerk using the ECF system, which will send notification to Defendants'

registered counsel.

Dated: February 1, 2018

/s/ Omar C. Jadwat

Omar C. Jadwat