

February 13, 2017

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:

We represent the plaintiffs in the above-referenced matter. Pursuant to § II.A of the Case Management Order, Plaintiffs respectfully request a Pre-Motion Conference regarding Plaintiffs' desire to file a motion for limited expedited discovery to prepare for Plaintiffs' forthcoming motion for preliminary injunction of President Trump's January 27, 2017 Executive Order (the "Executive Order").

Given the rapid pace of events surrounding the Executive Order, Plaintiffs' request for expedited discovery is reasonably timed and expeditiously filed. *See Tribal Casino Gaming, Enterprise v. W.G. Yates & Sons Construction Co.*, No. 1:16CV30, 2016 WL 3450829, at *3 (W.D.N.C. June 16, 2010). As Plaintiffs can set out in further detail for the court in today's telephonic conference and in the motion papers, Plaintiffs appreciate the expedited nature of the requested discovery and intend to seek discovery narrowly tailored to: (1) any guidance, memoranda, policies, or similar documents regarding the need for the Executive Order; and (2) any instructions and guidance issued to relevant agencies regarding the implementation and interpretation of the Executive Order and subsequent relevant court orders. *See, e.g., Dimension Data N. Am., Inc. v. NetStar-1, Inc.*, 226 F.R.D. 528, 530-31 (E.D.N.C. 2005). This narrow expedited discovery is necessary in this case to narrow the issues in dispute, especially in light of the rapidly changing legal and political landscape. And, given the carefully tailored nature of the request, this necessity outweighs any prejudice to Defendants.

Before filing this Notice, Plaintiffs were able to provide an overview of this Notice to opposing counsel during a phone call, but Defendants' counsel was not able at that time to state a position on the proposed motion for expedited discovery. Plaintiffs therefore respectfully request a Pre-Motion Conference and seek the Court's leave to file a motion for a limited expedited discovery.

Respectfully submitted,

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