



February 8, 2017

Honorable Theodore D. Chuang
United States District Court
District of Maryland

Re: International Refugee Assistance Project v. Trump,
No. 8:17-cv-00361 (TDC)

Dear Judge Chuang:

We represent the Plaintiffs in the above-referenced matter and we write to correct our error in filing Plaintiffs' Motion for Leave to Proceed under Pseudonyms (Doc. No. 5) ("Motion"), filed without observance of the proper procedures under this Court's Case Management Order (Doc. No. 4). In keeping with the Case Management Order, Section II.A., we write to request a pre-motion conference to seek leave to file this Motion.

The proposed Motion requests that five individual Plaintiffs in this action – John Does #1-4 and Jane Doe – be permitted to proceed under pseudonyms. All five Doe Plaintiffs would be at risk of great harm if their identities were revealed and the balance of equities tips strongly in favor of permitting them to proceed anonymously. The Doe Plaintiffs reasonably fear that public disclosure of their identities could subject them and/or their family members to retaliatory action by federal government officials. Further, given the current heated debate over immigration generally and the Executive Order which is the subject of this action, revealing Plaintiffs' true identities and personal stories could subject them and/or their family members to harassment and even physical harm. Permitting these Doe Plaintiffs to proceed anonymously would not materially harm the public interest; nor would it prejudice Defendants.

We therefore respectfully request leave to file the Motion, which relies on the standards established in *Doe v. Public Citizen*, 749 F.3d 246, 274 (4th Cir. 2014), and explains in greater detail the various grounds supporting Plaintiffs' request to proceed anonymously in this action.

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We would be happy to take any steps necessary to withdraw the filed Motion for Leave under Pseudonyms until such time that the Court can schedule a pre-motion conference on this motion.

Thank you for your consideration of this request.

Very Truly Yours,

/s/ Justin B. Cox

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