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The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

John Doe, Jane Doe, Jack Doe, Jason Doe, Julia
Doe, Joseph Doe and James Doe, individually,
and on behalf of all others similarly situated; the
Episcopal Diocese of Olympia, and the Council
on American Islamic Relations-Washington,

Plaintiffs,

v.

Donald Trump, President of The United States;
U.S. Department of State; Rex Tillerson,
Secretary of State; U.S. Department of
Homeland Security; John Kelly, Secretary of
Homeland Security; U.S. Customs and Border
Protection; Kevin McAleenan, Acting
Commissioner of U.S. Customs and Border
Protection; and Michele James, Field Director
of the Seattle Field Office of U.S. Customs and
Border Protection,

Defendants.

No. 2:17-cv-00178-JLR

STIPULATION AND ~~PROPOSED~~
ORDER TO ALLOW PLAINTIFFS TO
PROCEED ANONYMOUSLY

NOTING DATE: [APRIL 6, 2017]

Plaintiffs John Doe, Jane Doe, Jack Doe, Jason Doe, Julia Doe, Joseph Doe and James
Doe (collectively "Doe Plaintiffs") and Defendants Donald Trump, President of The United
States; U.S. Department of State; Rex Tillerson, Secretary of State; U.S. Department of
Homeland Security; John Kelly, Secretary of Homeland Security; U.S. Customs and Border

STIPULATION TO PROCEED
ANONYMOUSLY
(2:17-cv-00178-JLR) - 1

AMERICAN CIVIL LIBERTIES UNION
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1 Protection; Kevin McAleenan, Acting Commissioner of U.S. Customs and Border Protection;
2 and Michele James, Field Director of the Seattle Field Office of U.S. Customs and Border
3 Protection (collectively “Defendants”), through their undersigned counsel of record, hereby
4 stipulate and agree as follows:

5
6 Doe Plaintiffs filed a Class Action Complaint for Declaratory and Injunctive Relief on
7 February 7, 2017 and a First Amended Class Action Complaint for Declaratory and Injunctive
8 Relief on March 14, 2017.

9 Doe Plaintiffs represent to the Court that they filed their complaints under pseudonyms
10 because, *inter alia*, of widespread reports of the increases in anti-Muslim harassment around the
11 country, including here in Washington. Doe Plaintiffs fear similar harassment if they were to be
12 publicly named in this lawsuit.

13
14 At this time, Defendants do not oppose Plaintiffs’ motion to proceed under
15 pseudonyms. However, Defendants reserve the right at a future date either to request that the
16 Court enter a protective order to provide access to Defendants, or to move to unseal the identities
17 of one or more of the pseudonymous Plaintiffs. Although Defendants do not have a need at this
18 time for the pseudonymous Plaintiffs to reveal their identity or otherwise be publicly disclosed,
19 future litigation events—including, but not limited to, Defendants’ need to respond to any
20 motion for class certification—may require this Court to revisit the issue.

21
22 **WHEREAS,**

23 IT IS HEREBY STIPULATED by and among Doe Plaintiffs and Defendants, subject to
24 the Court’s approval, as follows:

25 Doe Plaintiffs shall be allowed to proceed under pseudonyms in this action at this time.
26

1 DATED this 6th day of April, 2017.

2 **Presented by:**

3 KELLER ROHRBACK L.L.P.

4 By: /s/ Lynn Lincoln Sarko
5 By: /s/ Tana Lin
6 By: /s/ Amy Williams-Derry
7 By: /s/ Derek W. Loeser
8 By: /s/ Alison S. Gaffney

9 Lynn Lincoln Sarko, WSBA # 16569
10 Tana Lin, WSBA # 35271
11 Amy Williams-Derry, WSBA #28711
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WASHINGTON FOUNDATION

By: /s/ Emily Chiang

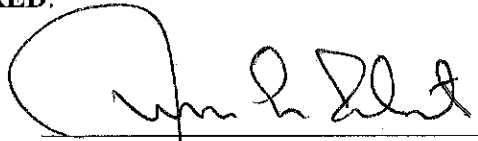
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Attorney for Plaintiffs

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED 7 April 2017



Hon. James L. Robart
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that, on April 6, 2017, a copy of the Stipulation and [Proposed] Order to Allow Plaintiffs to Proceed Anonymously was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I further certify that pursuant to Fed. R. Civ. P. 5(b)(E), I caused the foregoing document to be served on all Defendants by sending an electronic copy via e-mail to Michelle Bennett, counsel for Defendants, at Michelle.Bennett@usdoj.gov on April 6, 2017.

DATED this 6th day of April, 2017.

KELLER ROHRBACK L.L.P.

By: /s/ Tana Lin

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