



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.

//

//

//

//

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

Justin B. Cox (Bar No. 17550)
National Immigration Law Center
1989 College Ave. NE
Atlanta, GA 30317
Tel: (678) 404-9119
Fax: (213) 639-3911
cox@nilc.org
Karen C. Tumlin†
Nicholas Espiritu†
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

Omar C. Jadwat†
Lee Gelernt†
Hina Shamsi†
Hugh Handeyside†
Sarah L. Mehta†
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

Cecillia D. Wang†
Cody H. Wofsy†
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

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
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
kumar@aclu-md.org
steiner@aclu-md.org

*†Pro Hac Vice Applications Forthcoming
Counsel for Plaintiffs*