

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ZADEH, *et al.*,

Plaintiffs,

vs.

TRUMP, *et al.*,

Defendants.

Civil Action No. 1:17-cv-00243-TSC

**JOINT STATEMENT AND
STIPULATION TO WITHDRAW
PLAINTIFFS' EMERGENCY MOTION
FOR TEMPORARY RESTRAINING
ORDER**

At approximately 2:25 p.m. EST on February 6, 2017, Plaintiff Samaneh Raghimi cleared customs and immigration at the Minneapolis-St. Paul International Airport. She is now a lawful permanent resident of the United States.

In light of this development and in light of Plaintiff Saido Abdille's entry into the United States on February 5, *see* Dkt. 14, the parties hereby stipulate to the withdrawal of Plaintiffs' Emergency Motion for Temporary Restraining Order filed on February 3, 2017 (Dkt. 2.).

Dated: February 7, 2017

**COHEN MILSTEIN SELLERS & TOLL
PLLC**

/s/ S. Douglas Bunch

Kit A. Pierson (D.C. Bar No. 398123)
S. Douglas Bunch (D.C. Bar No. 974054)
Sally Handmaker (D.C. Bar No. 1005414)
Julia Horwitz (D.C. Bar No. 1018561)
1100 New York Ave. NW
Suite 500, East Tower
Washington, DC 20005
(202) 408-4600
kpierson@cohenmilstein.com
dbunch@cohenmilstein.com
shandmaker@cohenmilstein.com
jhorwitz@cohenmilstein.com

- and -

Adam L. Hansen
(admitted *pro hac vice*)
APOLLO LAW LLC
400 S. 4th St.
Suite 401M - 250
Minneapolis, MN 55415
(612) 927-2969
adam@apollo-law.com

- and -

Kevin C. Riach
(admitted *pro hac vice*)
Benjamin R. Tozer
(*pro hac vice* forthcoming)
FREDRIKSON & BYRON, P.A.
200 S. Sixth St.
Suite 4000
Minneapolis, MN 55402
(612) 492-7000
kriach@fredlaw.com
btozer@fredlaw.com

- and -

Benjamin Casper Sanchez
(*pro hac vice* forthcoming)
Regina Jeffries
(admitted *pro hac vice*)
Linus Chan
(*pro hac vice* forthcoming)
**CENTER FOR NEW AMERICANS
UNIVERSITY OF MINNESOTA LAW
SCHOOL**
229 19th Ave. S.
Minneapolis, MN 55455
(612) 625-5515
caspe010@umn.edu
rjefferi@umn.edu
rlchan@umn.edu

- and -

John Keller
(*pro hac vice* forthcoming)
**IMMIGRANT LAW CENTER OF
MINNESOTA**
450 N. Syndicate St., Suite 200
St. Paul, MN 55104
(651) 641-1011
John.Keller@ilcm.org

- and -

Sarah Brenes
(*pro hac vice* forthcoming)
THE ADVOCATES FOR HUMAN RIGHTS
330 Second Ave. S., Suite 800
Minneapolis, MN 55401
(612) 341-3302
sbrenes@advrights.org

- and -

Abdinasir M. Abdulahi
(*pro hac vice* forthcoming)
AMA LAW GROUP, PLLC
1113 E. Franklin Ave, Suite 104
Minneapolis, MN 55404
(612) 871-1110
abdi@amalawgroup.com

- and -

Arthur B. Spitzer (D.C. Bar No. 235960)
Scott Michelman (D.C. Bar No. 1006945)
**AMERICAN CIVIL LIBERTIES UNION
OF THE DISTRICT OF COLUMBIA**
4301 Connecticut Ave., N.W., Suite 434
Washington, DC 20008
(202) 457-0800
aspitzer@acludc.org
smichelman@acludc.org

Attorneys for Plaintiffs

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

WILLIAM C. PEACHEY
Director

COLIN A. KISOR
Deputy Director

J. MAX WEINTRAUB
Senior Litigation Counsel

ELIANIS N. PÉREZ
Senior Litigation Counsel

/s/ Joshua S. Press
JOSHUA S. PRESS
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 898, Ben Franklin Station
Washington, DC 20044
202.305.0106 | Fax: 202.305.7000
joshua.press@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on this 7th day of February 2017, a copy of the foregoing was filed electronically with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all parties and counsel in this case.

/s/ S. Douglas Bunch
S. Douglas Bunch