

December 4, 2017

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
Washington, D.C. 20543

Re: *Donald J. Trump, et al. v. International Refugee Assistance Project, et al.*, No. 17A560



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Dear Mr. Harris:

This matter is pending before the Court on the government's application to stay the preliminary injunction entered by the district court in these consolidated cases. The plaintiffs write to inform the Court of changed circumstances of which they have become aware since they filed their opposition on November 28.

1. The relatives of two individual *IRAP* plaintiffs, Shapour Shirani and Fakhri Ziaolhagh, have received visas. *See* CA4 J.A. 602-607. The visa for *IAAB* plaintiff John Doe No. 6's sister-in-law has been issued, but his mother-in-law's application remains pending. *See* CA4 J.A. 1174-1176. Similarly, *Zakzok* plaintiff Sumaya Hamadmad's sister has been granted a visa, but her father-in-law's application remains pending. *See* CA4 J.A. 1254-1258.

The points made in plaintiffs' opposition citing particular pending visa applications remain amply supported by various plaintiffs' still-pending visa applications. *See* Stay Opp. 27-28. Indeed, that these particular plaintiffs have now been reunited with their loved ones—or some of their loved ones—thanks to the preliminary injunction underscores how imminent the Proclamation's threatened injuries are and how crucial the injunction in this case is for the plaintiffs and others similarly situated.

2. President Trump last week posted three videos on his official Twitter account with the descriptions "Muslim migrant beats up Dutch boy on crutches!"; "Muslim Destroys a Statue of Virgin Mary!"; and "Islamist mob pushes teenage boy off roof

and beats him to death!” N.Y. Times, *Trump Shares Inflammatory Anti-Muslim Videos, and Britain’s Leader Condemns Them*, Nov. 29, 2017;¹ see also CBS News, *White House defends Trump’s Muslim tweet by mentioning travel ban*, Nov. 29, 2017.² The postings remain available on the President’s Twitter feed, <https://twitter.com/realDonaldTrump>, and are relevant to the question of purpose.

Plaintiffs intend to file a motion with the court of appeals to expand the record to include the recent statements, and to notify the court of appeals of these updates.



Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Omar C. Jadwat".

Omar C. Jadwat

Counsel for Respondents

cc: Noel Francisco

¹ <https://www.nytimes.com/2017/11/29/us/politics/trump-anti-muslim-videos-jayda-fransen.html>

² <https://www.cbsnews.com/news/white-house-defends-trumps-muslim-tweet-by-mentioning-travel-ban/>