

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the  
United States; *et al.*,

Defendants.

No. 2:17-CV-00094-RAJ

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION TO COMPEL  
DOCUMENTS WITHHELD UNDER THE  
LAW ENFORCEMENT AND  
DELIBERATIVE PROCESS PRIVILEGES**

This matter came before the Court on Plaintiffs' Motion to Compel Documents Withheld Under the Law Enforcement and Deliberative Process Privileges (Dkt. 260). Upon reviewing the papers submitted by the parties in support of and in opposition to the motion, and the files and pleadings in this case, the Court hereby ORDERS that Plaintiffs' motion is GRANTED.

IT IS FURTHER ORDERED that the Defendants produce the documents listed in Plaintiffs' Motion to Compel in unredacted form within 7 days of this order.

**IT IS SO ORDERED.**

Dated this \_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
The Honorable Richard A. Jones  
United States District Judge

1 Presented by:

2 s/ Jennifer Pasquarella  
3 s/ Sameer Ahmed  
4 Jennifer Pasquarella (admitted pro hac vice)  
5 Sameer Ahmed (admitted pro hac vice)  
6 **ACLU Foundation of Southern California**  
7 1313 W. 8th Street  
8 Los Angeles, CA 90017  
9 Telephone: (213) 977-5236  
10 jpasquarella@aclusocal.org  
11 sahmed@aclusocal.org

12 s/ Matt Adams  
13 Matt Adams #28287  
14 **Northwest Immigrant Rights Project**  
15 615 Second Ave., Ste. 400  
16 Seattle, WA 98122  
17 Telephone: (206) 957-8611  
18 matt@nwirp.org

19 s/ Stacy Tolchin  
20 Stacy Tolchin (admitted pro hac vice)  
21 **Law Offices of Stacy Tolchin**  
22 634 S. Spring St. Suite 500A  
23 Los Angeles, CA 90014  
24 Telephone: (213) 622-7450  
25 Stacy@tolchinimmigration.com

26 s/ Hugh Handeyside  
s/ Lee Gelernt  
s/ Hina Shamsi  
Hugh Handeyside #39792  
Lee Gelernt (admitted pro hac vice)  
Hina Shamsi (admitted pro hac vice)  
**American Civil Liberties Union Foundation**  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 549-2616  
lgelernt@aclu.org  
hhandeyside@aclu.org  
hshamsi@aclu.org

s/ Harry H. Schneider, Jr.  
s/ Nicholas P. Gellert  
s/ David A. Perez  
s/ Cristina Sepe  
Harry H. Schneider, Jr. #9404  
Nicholas P. Gellert #18041  
David A. Perez #43959  
Cristina Sepe #53609  
**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
HSchneider@perkinscoie.com  
NGellert@perkinscoie.com  
DPerez@perkinscoie.com  
CSepe@perkinscoie.com

s/ Trina Realmuto  
s/ Kristin Macleod-Ball  
Trina Realmuto (admitted pro hac vice)  
Kristin Macleod-Ball (admitted pro hac vice)  
**American Immigration Council**  
1318 Beacon Street, Suite 18  
Brookline, MA 03446  
Telephone: (857) 305-3600  
trealmuto@immcouncil.org  
kmacleod-ball@immcouncil.org

s/ Emily Chiang  
Emily Chiang #50517  
**ACLU of Washington Foundation**  
901 Fifth Avenue, Suite 630  
Seattle, WA 98164  
Telephone: (206) 624-2184  
Echiang@aclu-wa.org

*Counsel for Plaintiffs*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below, I caused service of the foregoing document via the CM/ECF system, which will automatically send notice of such filing to all counsel of record.

DATED April 11, 2019, at Seattle, Washington.

s/ Cristina Sepe  
Cristina Sepe, WSBA No. 53609  
Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
Email: CSepe@perkinscoie.com