

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

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  
PRODUCTION OF DOCUMENTS**

1 THE COURT, having considered Plaintiffs' Motion to Compel Production of Documents  
2 and the papers in opposition to the motion, and being fully advised now, therefore, it is hereby  
3 ORDERED that Plaintiffs' Motion to Compel Production of Documents is hereby  
4 GRANTED;

5 And it is further ORDERED that:

- 6 1. Defendants' Objection to Identifying Class Members and the Reasons Named  
7 Plaintiffs were Subject to CARRP in Response to Plaintiffs' Requests for  
8 Production Numbers 13, 15, 17, 19, 21, 34, and 35 is OVERRULED;
- 9 2. Defendants' Objection to Reviewing Sources of Potentially Classified Documents  
10 and Detailing Responsive, Classified Documents in a Log is OVERRULED;
- 11 3. Defendants' Objection to Producing Documents Related to Executive Orders  
12 13769 and 13780 in Response to Plaintiffs' Requests for Production Numbers 23  
13 and 24 is OVERRULED;
- 14 4. Defendants' Limitation of their Production of Documents Responsive to  
15 Plaintiffs' Requests for Production Numbers 1, 3-10, 22, 24-25 to Documents of  
16 "National Applicability" is OVERRULED; and
- 17 5. Defendants Must Respond to Plaintiffs' Requests for Production Numbers 1, 3-  
18 10, 13, 15, 17, 19, 21, 22-25, 34 and 35 within 21days of this Order.

19 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2017.

20  
21  
22 \_\_\_\_\_  
HONORABLE RICHARD A. JONES  
UNITED STATES DISTRICT JUDGE  
23

24 DATED this 28th day of September, 2017.

25 Presented by:  
26

1 s/Jennifer Pasquarella (admitted pro hac vice)  
 2 s/Sameer Ahmed (admitted pro hac vice)  
 3 ACLU Foundation of Southern California  
 4 1313 W. 8th Street  
 5 Los Angeles, CA 90017  
 Telephone: (213) 977-5236  
 Facsimile: (213) 997-5297  
 jpasquarella@aclusocal.org  
 sahmed@aclusocal.org

6 s/Matt Adams  
 7 s/Glenda M. Aldana Madrid  
 8 Matt Adams #28287  
 Glenda M. Aldana Madrid #46987  
 9 **Northwest Immigrant Rights Project**  
 10 615 Second Ave., Ste. 400  
 Seattle, WA 98122  
 Telephone: (206) 957-8611  
 Facsimile: (206) 587-4025  
 matt@nwirp.org  
 glenda@nwirp.org

11 s/Stacy Tolchin (admitted pro hac vice)  
 12 **Law Offices of Stacy Tolchin**  
 13 634 S. Spring St. Suite 500A  
 14 Los Angeles, CA 90014  
 Telephone: (213) 622-7450  
 15 Facsimile: (213) 622-7233  
 Stacy@tolchinimmigration.com

16 s/Hugh Handeyside  
 17 Hugh Handeyside #39792  
 18 s/Lee Gelernt (admitted pro hac vice)  
 19 s/Hina Shamsi (admitted pro hac vice)  
 20 **American Civil Liberties Union Foundation**  
 21 125 Broad Street  
 New York, NY 10004  
 Telephone: (212) 549-2616  
 Facsimile: (212) 549-2654  
 22 lgelernt@aclu.org  
 23 hhandeyside@aclu.org  
 hshamsi@aclu.org

s/Harry H. Schneider, Jr.  
 Harry H. Schneider, Jr. #9404  
s/Nicholas P. Gellert  
 Nicholas P. Gellert #18041  
s/David A. Perez  
 David A. Perez #43959  
s/Laura K. Hennessey  
 Laura K. Hennessey #47447  
 Attorneys for Plaintiffs  
**Perkins Coie LLP**  
 1201 Third Avenue, Suite 4900  
 Seattle, WA 98101-3099  
 Telephone: 206.359.8000  
 Facsimile: 206.359.9000  
 Email: HSchneider@perkinscoie.com  
 NGellert@perkinscoie.com  
 DPerez@perkinscoie.com  
 LHennessey@perkinscoie.com

s/Trina Realmuto (admitted pro hac vice)  
s/Kristin Macleod-Ball (admitted pro hac vice)  
 Trina Realmuto  
 American Immigration Council  
 100 Summer St., 23rd Fl.  
 Boston, MA 02110  
 Tel: (857) 305-3600  
 Email: trealmuto@immcouncil.org  
 Email: 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

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**

The undersigned certifies that on the dated indicated below, I caused service of the foregoing [PROPOSED] ORDER GRANTING PLAINTIFFS’ MOTION TO COMPEL PRODUCTION OF DOCUMENTS via the CM/ECF system that will automatically send notice of such filing to all counsel of record herein.

DATED this 28th day of September, 2017, at Seattle, Washington.

s/Laura K. Hennessey  
Laura K. Hennessey #47447  
Attorneys for Plaintiffs  
**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
Email: LHennessey@perkinscoie.com