

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

PARS EQUALITY CENTER et al.,

Plaintiffs,

v.

DONALD J. TRUMP et al.,

Defendants.

Civil Action No. 1:17-cv-255

Hon. Tanya S. Chutkan

**PROPOSED ORDER GRANTING PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

The Court, having considered Plaintiffs' Motion for Preliminary Injunction ("Motion") and any opposition thereto, and finding that good cause appears, orders as follows:

The Motion is hereby GRANTED.

1. Defendants are hereby preliminarily restrained and enjoined from:

(a) enforcing Sections 2 and 3(c) of the Proclamation No. 9645 "Enhancing Vetting Capabilities and Processes for Detecting Attempted Entry into the United States By Terrorists or other Public-Safety Threats" ("September 24 Proclamation"), including at any United States border or point of entry;

(b) applying Sections 2 and 3(c) of the September 24 Proclamation to deny, revoke, delay, suspend, restrict or cancel any immigrant or nonimmigrant visa or refugee status;

(c) applying Sections 2 and 3(c) of the September 24 Proclamation to delay, suspend or cease immigrant or nonimmigrant visa application or issuance processing;

(d) applying Sections 2 and 3(c) of the September 24 Proclamation to delay, suspend or cease refugee applicant processing;

(e) applying Sections 2 and 3(c) of the September 24 Proclamation to delay, deny or suspend entry or admission to any person;

(f) applying Sections 2 and 3(c) of the September 24 Proclamation to prohibit any person from applying for or receiving any benefit under the Immigration and Nationality Act of 1965 if receipt is otherwise lawful, including an immigrant or nonimmigrant visa, lawful permanent residence, asylum or refugee status or other adjustment of status;

(g) denying any person subject to the Sections 2 and 3(c) of the September 24 Proclamation access to legal counsel of his or her choice;

(h) applying Sections 2 and 3(c) of the September 24 Proclamation to instruct any airline or other common carrier to deny passage to any person; and

(i) imposing or threatening to impose any financial penalty on any airline or other common carrier for allowing passage to any person covered by Sections 2 and 3(c) of the September 24 Proclamation;

(h) enforcing any requirements contained in or similar to §§ 2(c)-(e), 3, 6(a), and 6(c) of the March 6 Executive Order and §§ 3(c), 5(a)-(c) and 5(e) of the January 27 Executive Order.

2. Defendants are further ordered to:

(a) within 10 days, submit written guidance for employees, contractors, and agents of U.S. Customs and Border Protection and any other U.S. government entity necessary to ensure full and timely compliance with all terms of this Order to the Court for its review and approval, and, when such approval is granted, immediately issue such guidance;

(b) immediately rescind any guidance, directive, memorandum or statement interpreting or applying the September 24 Proclamation that conflicts with any term of this Order;

(c) immediately upon its issuance, prominently post a copy of the written guidance required under paragraph 2(a) on government websites, including state.gov and uscis.gov; and

(d) within 10 days, update all relevant public guidance, documentation, and FAQs to reflect the terms of this Order.

IT IS SO ORDERED.

Dated: October __, 2017

U.S. DISTRICT JUDGE