

**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;

(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) enforcing the October 24, 2017 Executive Order or the October 23, 2017 Memorandum from Secretary Tillerson, Secretary Duke, and Director of National Intelligence Coates (“October 23, 2017 Memorandum”) or applying Sections 2 and 3(c) of the September 24 Proclamation to deny, revoke, delay, suspend, restrict, or cancel any refugee status or refugee applicant processing; and

(e) applying the October 24, 2017 Executive Order or the October 23, 2017 Memorandum to “prioritize refugee applications” from “non-SAO countries” or “reallocate . . . resources that may have been dedicated to processing nationals” of SAO countries “to process applicants from non-SAO countries.”

2. Defendants are further ordered to:

(a) within 10 days, submit a report on the current status of the pending immigrant and nonimmigrant visa and refugee applications of the plaintiffs and/or their family members who are identified by name in the Second Amended Complaint;

(b) 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