

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MAZDAK POURABDOLLAH
TOOTKABONI and
ARGHAVAN LOUHGHALAM,

Petitioners,

Case No.17-10154

v.

DONALD TRUMP, President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY (“DHS”); U.S. CUSTOMS AND BORDER PROTECTION (“CBP”); JOHN KELLY, Secretary of DHS; KEVIN K. MCALEENAN, Acting Commissioner of CBP; and WILLIAM MOHALLEY, Boston Field Director, CBP,

Respondents.

MOTION BY PLAINTIFFS-INTERVENORS COMMONWEALTH OF MASSACHUSETTS AND UNIVERSITY OF MASSACHUSETTS TO INTERVENE

The Commonwealth of Massachusetts and the University of Massachusetts (collectively, the “Commonwealth”) respectfully move pursuant to Federal Rule of Civil Procedure 24 to intervene as plaintiffs in this action.

Intervention is warranted as of right because the motion is timely and the Commonwealth has strong interests in this litigation. The Executive Order at issue compels the Commonwealth to engage in unlawful, unconstitutional, and economically and socially destructive discrimination; it causes harm to the Commonwealth’s economy by hampering the movement of people and ideas into the state and by discouraging internationally-linked activity in Massachusetts; and it affects the ability of thousands of immigrants, refugees, and asylees to travel to and from Massachusetts. In addition, both the Commonwealth generally and the

Motion allowed.

W.M. Gorton, USDJ 2/2/17