

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

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MAZDAK POURABDOLLAH TOOTKABONI  
and ARGHAVAN LOUHGHALAM,

*Plaintiff-Petitioners,*

FATEMEH YAGHOUBI MOGHADAM,  
BABAK YAGHOUBI MOGHADAM, ALI  
SANIE, ZAHRASADAT MIRRAZI  
RENANI, LEILY AMIRSARDARY, and  
OXFAM AMERICA, INC.

*Plaintiffs,*

v.

No.17-cv-10154-NMG

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

*Defendants.*

**PLAINTIFF-PETITIONERS’ AND PLAINTIFFS’ MOTION FOR LEAVE TO FILE  
RESPONSE IN SUPPORT OF CONTINUATION OF TEMPORARY RESTRAINING  
ORDER AND TO SET BRIEFING SCHEDULE FOR EXPEDITED PRELIMINARY  
INJUNCTION**

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Plaintiff - Petitioners Arghavan Louhghalam and Mazdak Pourabdollah Tootkaboni and  
Plaintiffs Fatemeh Yaghoubi Moghadam, Babak Yaghoubi Moghadam, Ali Sanie, Zahrasadat  
Mirrazi Renani, Leily Amirsardary, and Oxfam America, Inc. (collectively, “Plaintiffs”)  
respectfully request permission to file the attached Reply Memorandum in Support of

Continuation of Temporary Restraining Order and to Set Briefing Schedule for Expedited Preliminary Injunction.

As grounds therefor, Plaintiffs state that Defendants did not inform Plaintiffs until earlier today as to whether they would oppose extending the TRO, and that the TRO was based on the Complaint prior to its amendment.

Respectfully submitted,

/s/ Susan Church

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/s/ Kerry E. Doyle

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/s/ Michael S. Gardener

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/s/ Matthew R. Segal

Matthew R. Segal (BBO #654489)  
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Date: February 3, 2017

**CERTIFICATE OF SERVICE**

I, Michael S. Gardener, hereby certify that the foregoing document will be filed through the ECF system on February 3, 2017, which will cause counsel for all parties to be electronically served.

Respectfully submitted,

/s/ Michael S. Gardener  
Michael S. Gardener

**CERTIFICATE OF COMPLIANCE WITH L.R. 7.1**

I, Matthew R. Segal, hereby certify that I attempted to confer with counsel for the defendants in an effort to resolve or narrow the issues raised by this motion.

Date: February 3, 2017

/s/ Matthew R. Segal  
Matthew R. Segal