

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

LINDA SARSOUR, *et al.*;

Plaintiffs,

v.

DONALD J. TRUMP, President of the United  
States of America; in his official capacity, *et al.*;

Defendants.

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Case No. 17-cv-00120  
Hon. Anthony J. Trenga

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**NOTICE OF NEW EVIDENCE AND ADDITIONAL AUTHORITY**

At a large rally, in front of placards reading “Promises Made, Promises Kept,” Defendant Trump gave a speech where he explicitly connected the enjoined and now-withdrawn First Muslim Ban to the Revised Muslim Ban, which has now been enjoined<sup>1</sup> as well. After citing “the devastation from 9/11, to Boston, to San Bernardino”—attacks that would not have been impacted by the Revised Muslim Ban—Defendant Trump conceded that “[t]he order [U.S. District Court Judge Derrick Watson] blocked was a watered-down version of the first order that was also blocked by another judge and should have never been blocked to start with.”<sup>2</sup> Lest there be any doubt as to whether President Trump meant what he said, he repeated it two more times. “This is a watered-down version of the first one. This is a watered-down version.”<sup>3</sup> Then he went on to proclaim “[a]nd let me tell you something, I think we ought to go back to the first one and go all the way, which is what I wanted to do in the first place.”<sup>4</sup>

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<sup>1</sup> Thus far, two district court judges have issued temporary restraining orders against the Revised Muslim Ban. See *Hawai’i et.al. v. Trump*, No. 17-cv-00050 DKW-KSC, Dkt. 219 (March 15, 2017); see also *International Refugee Assistance Project et. al. v. Trump et. al.*, No. 17-cv-00361, Dkt. 149 (March 16, 2017).

<sup>2</sup> Complete video of Defendant Trump’s speech, March 15, 2017, at 20:15-20:35; available at: <https://www.youtube.com/watch?v=x2hzppy4X1s>

<sup>3</sup> *Id.* at 25:25-25:43.

<sup>4</sup> *Id.*

This new evidence corroborates the evidence Plaintiffs have previously provided to the Court, which makes clear that Defendant Trump did not abandon his discriminatory intent on March 6, 2017 when he issued the Revised Muslim Ban and revoked the First Muslim Ban.

Respectfully submitted,

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Dated: March 20, 2017

**Certificate of Service**

I hereby certify that on March 20, 2017, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Virginia using the ECF System, which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

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