1 THE HONORABLE RICHARD A. JONES 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 ABDIQAFAR WAGAFE, et al., on behalf No. 2:17-cv-00094-RAJ of themselves and others similarly situated, 10 [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL Plaintiffs, 11 PRODUCTION OF DOCUMENTS **RESPONSIVE TO RFPS 40, 41, AND 44** v. 12 DONALD TRUMP, President of the **NOTE ON MOTION CALENDAR:** 13 United States, et al., **FEBRUARY 23, 2018** 14 Defendants. 15 16 17 18 19 20 21 22 23 24 25 26 Perkins Coie LLP [PROPOSED] ORDER GRANTING PLAINTIFF'S

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS (No. 2:17-cv-00094-RAJ) – 1 138441285.1

Perkins Coie LLP
1201 Third Avenue, Suite 4900
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1	THE COURT, having considered Plaintiffs' Motion to Compel Production of Documen		
2	and the papers in opposition to the motion, and being fully advised now, therefore, it is hereby		
3	ORDERED that Plaintiffs' Motion to Compel Production of Documents Responsive to		
4	RFPs 40, 41, and 44 is hereby GRANTED;		
5	AND IT IS FURTHER ORDERED that the parties must meet and confer within seven		
6	(7) days from the date of this Order to discuss search terms and other means of review, as well a		
7	custodians and non-custodial sources that Defendants will use to search for documents		
8	responsive to RFPs 40, 41, and 44. Defendants shall conduct their search of the records within		
9	seven (7) days of the parties' meeting. Defendants will then have thirty (30) days to produce		
10	relevant records, if any exist, to Plaintiffs and to produce a proper privilege log, to the extent		
11	Defendants assert any privileges relating to this discovery. To be clear, the search terms,		
12	custodians, and document sources used, as well as Defendants' subsequent production of		
13	documents, must be designed to include any responsive documents that are relevant to the		
14	proposed Muslim Ban Class and the Extreme Vetting Initiative that has been implemented by		
15	Immigration and Customs Enforcement.		
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17	DATED this, 2018.		
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20	HONORABLE RICHARD A. JONES UNITED STATES DISTRICT JUDGE		
21	CIVITED STATES DISTRICT JUDGE		
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	Perkins Coie LLP		

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1	DATED this 8th day of February, 2018.	
2	Presented by:	
3	s/Jennifer Pasquarella (admitted pro hac vice)	s/ Harry H. Schneider, Jr.
4	s/Sameer Ahmed (admitted pro hac vice) ACLU Foundation of Southern California	Harry H. Schneider, Jr. #9404 s/ Nicholas P. Gellert
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16 17	Telephone: (213) 622-7450 Facsimile: (213) 622-7233	Boston, MA 02110 Tel: (857) 305-3600
18	Stacy@tolchinimmigration.com	Email: trealmuto@immcouncil.org Email: kmacleod-ball@immcouncil.org
19	s/ <u>Hugh Handeyside</u> Hugh Handeyside #39792	s/Emily Chiang
20	s/ <u>Lee Gelernt (admitted pro hac vice)</u> s/ <u>Hina Shamsi (admitted pro hac vice)</u> American Civil Liberties Union Foundation	Emily Chiang #50517 ACLU of Washington Foundation
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CERTIFICATE OF SERVICE

The undersigned certifies that on the dated indicated below, I caused service of the foregoing [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS RESPONSIVE TO RFPS 40, 41 AND 44 via the CM/ECF system that will automatically send notice of such filing to all counsel of record herein.

DATED this 8th day of February, 2018, at Seattle, Washington.

s/Laura Hennessey

Laura Hennessey #47447 Attorneys for Plaintiffs

Perkins Coie LLP

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