UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

JOHN DOE,

Plaintiff,

-against-

DONALD J. TRUMP, as President of the United States of America; JOHN F. KELLY, as Secretary of the Department of Homeland Security; THE DEPARTMENT OF HOMELAND SECURITY; LORI SCIALABBA, as Acting Director of the U.S. Citizenship and Immigration Services; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; REX W. TILLERSON, as Secretary of State; U.S. DEPARTMENT OF STATE; and THE UNITED STATES OF AMERICA,

Defendants.

Civil Action No.: 17-cv-112

Chief Judge William M. Conley

NOTICE OF PLAINTIFF'S
RENEWED APPLICATION FOR
A TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law; the Declaration of Andrew B. Breidenbach in Support of Plaintiff's Application for a Temporary Restraining Order, Preliminary Injunction, and Summary Judgment, dated February 13, 2017 (Dkt. No. 13); the Declaration of John Doe in Support of His Renewed Application for a Temporary Restraining Order and Preliminary Injunction, dated March 10, 2017; the Second Declaration of Andrew B. Breidenbach in Support of Plaintiff's Renewed Application for a Temporary Restraining Order and Preliminary Injunction, dated March 10, 2017; and Plaintiff's Proposed Statement of Record Facts, as well as any other matter that the Court may determine to be just and proper, Plaintiff, by and through his attorneys, moves this Court for a temporary restraining order and preliminary injunction.

PLEASE TAKE FURTHER NOTICE that Plaintiff's counsel notified Defendants' counsel on March 6, 2017 that Plaintiff planned to seek the foregoing relief.

Dated: New York, New York March 10, 2017 Respectfully submitted,

By: /s/ Vincent Levy

(646) 837-5151

HOLWELL SHUSTER & GOLDBERG LLP
Vincent Levy (vlevy@hsgllp.com)
Lauren Giudice (lgiudice@hsgllp.com)
Andrew Breidenbach (abreidenbach@hsgllp.com)
Andrei Vrabie (avrabie@hsgllp.com)
Matthew V.H. Noller (mnoller@hsgllp.com)
Sarah Sternlieb (ssternlieb@hsgllp.com)
Kevin Benish (kbenish@hsgllp.com) (law clerk – New York State Bar admission pending)
750 Seventh Avenue, 26th Floor
New York, NY 10019

PINES BACH LLP
Lester A. Pines, SBN 1016543
Tamara B. Packard, SBN 1023111
Alison TenBruggencate, SBN 1018869
122 West Washington Ave., Ste. 900
Madison, WI 53703
(608) 251-0101 (telephone)
(608) 251-2883 (facsimile)
lpines@pinesbach.com
tpackard@pinesbach.com
atenbruggencate@pinesbach.com

Attorneys for Plaintiff