

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

PARS EQUALITY CENTER, IRANIAN
AMERICAN BAR ASSOCIATION,
NATIONAL IRANIAN AMERICAN
COUNCIL, PUBLIC AFFAIRS ALLIANCE
OF IRANIAN AMERICANS et al.,

Plaintiffs,

v.

DONALD J. TRUMP et al.,

Defendants.

No. 17-cv-255

Electronically Filed

PARTIES' JOINT STATUS REPORT

Pursuant to the Court's minute order of March 6, 2017 for the "parties to file a joint status report setting forth their proposal for moving forward with this case," Plaintiffs and Defendants respectfully submit this joint status report and proposed schedule:

1. Plaintiffs will file an amended complaint and their motion for preliminary injunction on **March 14, 2017**. The parties agree that this motion should be governed by Local Rule 65, except as described herein.

2. Defendants' opposition to the motion for preliminary injunction should be due on or before **March 23, 2017**.

3. Following the submission of Defendants' opposition, the parties request a status conference to discuss the parameters of the preliminary injunction hearing. In the event either party is proposing live testimony at the preliminary injunction hearing, that party will provide notice to opposing counsel and the Court 72 hours prior to the status conference, along with a list of the witnesses to be examined and an estimate of the time required.

4. Plaintiffs' reply in support of the motion for preliminary injunction should be due on or before **March 30, 2017**.

5. Consistent with Local Civil Rule 65.1(d), Plaintiffs respectfully request that a hearing on their motion for a preliminary injunction be scheduled on or before **April 4, 2017**. Consistent with Local Civil Rule 16.2(c)(2), undersigned counsel for Defendants respectfully informs the Court that counsel has a previously scheduled personal commitment beginning at 12 p.m. on April 3, 2017, though others within the Department of Justice would be available to attend a hearing on that date.

March 10, 2017

Respectfully submitted,

Cyrus Mehri (D.C. Bar # 420970)
Joanna K. Wasik (D.C. Bar. # 1027916)
Amelia A. Friedman (D.C. Bar. # 1033583)
MEHRI & SKALET, PLLC
1250 Connecticut Ave., NW
Suite 300
Washington, DC 20036
(202) 822-5100
(202) 822-4997 (fax)
cmehri@findjustice.com

Kristen Clarke (D.C. Bar # 973885)
Jon Greenbaum (D.C. Bar # 489887)
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1401 New York Ave., NW
Suite 400
Washington, DC 20005
(202) 662-8600
(202) 783-0857 (fax)
jgreenbaum@lawyerscommittee.org

/s/ John A. Freedman
John A. Freedman (D.C. Bar # 453075)
David P. Gersch (D.C. Bar # 367469)
R. Stanton Jones (D.C. Bar # 987088)
Nancy L. Perkins (D.C. Bar # 421574)
Ronald A. Schechter (D.C. Bar # 245019)
Robert N. Weiner (D.C. Bar # 298133)
Samuel M. Witten (D.C. Bar # 378008)
Lindsey D. Carson (D.C. Bar # 992620)
Sonia Tabriz (D.C. Bar # 1025020)
Sally L. Pei (D.C. Bar # 1030194)
Stephen K. Wirth (D.C. Bar # 1034038)
ARNOLD & PORTER
KAYE SCHOLER LLP
601 Massachusetts Ave., NW
Washington, DC 20001
(202) 942-5000
(202) 942-5999 (fax)
john.freedman@apks.com

Christopher M. Odell
(*pro hac vice* motion forthcoming)
ARNOLD & PORTER
KAYE SCHOLER LLP
700 Louisiana Street, Suite 1600
Houston, TX 77002
(713) 576-2400
(713) 576-2499 (fax)
christopher.odell@apks.com

Counsel for Plaintiffs

CHAD A. READLER
Acting Assistant Attorney General

CHANNING D. PHILLIPS
United States Attorney

JOHN R. TYLER
Assistant Branch Director

/s/ Daniel Schwei

DANIEL SCHWEI (N.Y. Bar)
MICHELLE R. BENNETT (Co. Bar No.
37050)

ARJUN GARG (D.C. Bar No. 975335)

BRAD P. ROSENBERG (D.C. Bar No.
467513)

Trial Attorneys

United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave. NW

Washington, DC 20530

Tel.: (202) 305-8693

Fax: (202) 616-8470

Email: daniel.s.schwei@usdoj.gov

Mailing Address:

Post Office Box 883

Washington, D.C. 20044

Courier Address:

20 Massachusetts Avenue N.W.

Washington, D.C. 20001

Counsel for Defendants