

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

MAZDAK POURABDOLLAH
TOOTKABONI and
ARGHAVAN LOUHGHALAM,

Case No. 17-cv-10154

Petitioners,

v.

DONALD TRUMP, President of the United
States; 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,

Date: January 28, 2017

Respondents.

PROPOSED ORDER

Petitioners respectfully request to enter the following order:

1. Issue an injunction ordering Respondents not to detain, remove, or interrogate any individual solely on the basis of the Executive Order.
2. Adopt the decision of the Eastern District of New York in its entirety with an amendment to specifically include lawful permanent residents.
3. Enter a judgment declaring that Respondents’ detention of Petitioners is and will be unauthorized by statutes and is contrary to laws of the United States.

4. Award Petitioners reasonable costs and attorney's fees;
5. Direct Respondents order Customs and Border Protection to contact Airlines that have flights arriving at Logan Airport and inform them of this Court's order.
6. Grant any other and further relief that this Court may deem fit and proper.

DATED: January 28, 2017
Boston, Massachusetts

Respectfully submitted,

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