

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

MAZDAK POURABDOLLAH
TOOTKABONI and
ARGHAVAN LOUHGHALAM,

Case No.17-10154

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,

Respondents.

**ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE AMENDED
COMPLAINT**

Petitioners Mazdak Pourabdollah Tootkaboni and Arghavan Louhghalam respectfully move for a two-day extension of their deadline to file an amended complaint. In support of this motion, petitioners state:

1. Petitioners filed a petition for writ of habeas corpus and complaint for declaratory and injunctive relief on January 28, 2017.
2. On an emergency basis, this Court held a hearing on January 28-29, 2017, and issued a temporary restraining order setting a deadline of January 30, 2017, for petitioners to file an amended complaint.

3. Counsel for petitioners have been working diligently to prepare an amended complaint and to respond to overwhelming requests for assistance that have poured in from around the world.

4. Meanwhile, it has been reported that the Commonwealth of Massachusetts intends to move to move to intervene in this case, and we anticipate that such a motion would be filed on or before February 1, 2017.

5. Given these developments and the substantial burdens associated with litigating this case, petitioners will be unable to file an amended complaint on January 30, 2017.

6. Counsel for the petitioners have consulted with counsel for the respondents, and the respondents consent to the relief requested in this motion.

WHEREFORE, petitioners respectfully request that this Court extend by two days, until February 1, 2017, their deadline for filing an amended complaint.

DATED: January 30, 2017
Boston, Massachusetts

Respectfully submitted,

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CERTIFICATION UNDER LOCAL RULE 7.1

I hereby certify that I have conferred with counsel for the Respondents in an effort to resolve or narrow the issues raised by this motion.

DATED: January 30, 2017

/s/ Matthew R. Segal
Matthew R. Segal

CERTIFICATE OF SERVICE

I, Matthew R. Segal, hereby certify that the foregoing document will be filed through the ECF system on January 30, 2017, which will cause counsel for all parties to be electronically served.

Respectfully submitted,

/s/ Matthew R. Segal
Matthew R. Segal