

**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.*

**MOTION TO PERMIT PUBLIC ACCESS TO ELECTRONIC CASE FILES**

Petitioners Mazdak Pourabdollah Tootkaboni and Arghavan Louhghalam respectfully move to permit the public to access any filings in the case that are not filed under seal. Notwithstanding any other applicable local rule, petitioners submit that there is substantial public interest in this case and that public access to the electronic case files would benefit the public and the Court.

Counsel for the petitioners have consulted with counsel for the respondents, and the respondents do not consent to the relief requested in this motion.

WHEREFORE, petitioners respectfully request that this Court grant the public electronic access to non-sealed electronic filings in this case.

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