

**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.

So Ordered,

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Allison D. Burroughs  
United States District Judge

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Judith G. Dein  
United States Magistrate Judge

DATED: January 28, 2017  
Boston, Massachusetts