IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MOHAMMED ABDULLAH TAWFEEQ,	)	
Plaintiff.	)	
	)	**Case No. 1:17-cv-353**
v.	)	
U.S. DEPARTMENT OF HOMELAND SECURITY ("DHS"); **JOHN F. KELLY,** Secretary of DHS; **U.S. CUSTOMS AND BORDER PROTECTION** ("CBP"); **KEVIN K. MCALEENAN,** Acting Commissioner of CBP; **CAREY DAVIS,** Port Director, CBP ; **ANDY PRYOR,** Manager, CBP; **SHANA WELLS,** Manager, CBP; **U.S. DEPARTMENT OF STATE** ("Department of State"); **THOMAS A. SHANNON, JR.,** Acting Secretary of State, Department of State.	)	**EMERGENCY MOTION TO EXPEDITE PROCEEDINGS**
Defendants.	)	

PLAINTIFF'S EMERGENCY MOTION TO EXPEDITE PROCEEDINGS

By and through undersigned counsel, Plaintiff moves for expedited consideration of this matter pursuant to 28 U.S.C. § 1657 and Local Rule 65.2, because the issues raised in the complaint rely on Plaintiff's rights under the U.S. Constitution and federal immigration law that are of immediate importance and that could evade review if the regular briefing schedule is not significantly

accelerated to reflect the expedited timetable set forth in the proposed order. For the reasons outlined in the accompanying Memorandum of Law in support of the Motion, Plaintiff requests that the Court order Defendants to respond to his Complaint no later than 10 days after any order granting this motion, and that the Court set a summary judgment briefing schedule that will end no later than 20 days thereafter. Plaintiff further requests that Defendants be required to promptly respond to this Motion.

DATED February 1, 2017

Respectfully submitted,

/s/ Theresia Moser

Theresia M. Moser
Georgia Bar No. 526514
Moser Law Co.
112 Krog Street N.E., Suite 26
Atlanta, GA 30307
Phone: (404) 537-5339
Fax: (404) 537-5340
tmoser@moserlawco.com

Carl W. Hampe (*pro hac vice*)
Daniel P. Pierce (*pro hac vice*)
Fragomen, Del Rey, Bernsen & Loewy LLP
1101 15th St. NW, Suite 700
Washington, DC 20005
Phone: (202) 223-5515
Fax: (202) 371-2898
champe@fragomen.com
dpierce@fragomen.com

Attorneys for Plaintiff

CERTIFICATE OF FONT AND POINT SELECTION

Undersigned counsel hereby certifies, pursuant to L.R. 7.1(D), N.D. Ga., that the foregoing **PLAINTIFF'S EMERGENCY MOTION TO EXPEDITE PROCEEDINGS AND SUPPORTING MEMORANDUM AND PROPOSED ORDERS** were prepared in Times New Roman, 14 point font, which is one of the font and point selections approved in L.R. 5.1, N.D. Ga.

/s/ Theresia Moser
Theresia M. Moser

CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed a true and correct copy of the within and foregoing **PLAINTIFF'S EMERGENCY MOTION TO EXPEDITE PROCEEDINGS AND SUPPORTING MEMORANDUM AND PROPOSED ORDERS** by overnight Federal Express to each of the following:

The Honorable John F. Kelly,
Secretary of Homeland Security
U.S. Department of Homeland Security
245 Murray Lane, SW
Mail Stop 0485
Washington, DC 20528-0485

Kevin K. McAleenan, Acting Commissioner
U.S. Customs and Border Protection
1300 Pennsylvania Ave. NW
Washington, DC 20229

Carey Davis, Port Director,
Andy Pryor, Manager,
Shanna Wells, Manager,
U.S. Customs and Border Protection,
Atlanta Hartsfield/Jackson Int'l Airport
157 Tradeport Drive
Atlanta, GA 30354

Thomas A. Shannon, Acting Secretary of State
U.S. Department of State
2201 C St. NW
Washington, DC 20520

Courtesy copies of the above documents were sent via electronic mail to the following individuals with whom Plaintiff has made initial contact on behalf of the government:

Lori Beranek
Assistant United States Attorney
Northern District of Georgia
U.S. Department of Justice
Lori.Beranek@usdoj.gov

Sheetul S. Wall
Office of Immigration Litigation
U.S. Department of Justice
Sheetul.S.Wall2@usdoj.gov

This 1st day of February 2017.

/s/ Theresia Moser
Theresia M. Moser