

The Honorable Richard A. Jones

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIQAFAR WAGAFE, *et al.*, on behalf of
himself and other similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the United
States, *et al.*,

Defendants.

CASE NO. C17-00094RAJ

**NOTICE OF MOTION AND
DEFENDANTS' CROSS-MOTION
FOR PROTECTIVE ORDER**

(Note On Motion Calendar For:
April 4, 2019)

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Defendants hereby move this Court for an order that discovery not be had with respect to Plaintiffs' request for information concerning why the named Plaintiffs' applications were handled under CARRP, assuming that occurred; and Plaintiffs' Request For Production No. 53, directing Defendants to produce "[t]he Alien Files ("A files") of 100 members of the Naturalization and Adjustment Classes statistically chosen at random."

This motion is made and based on the accompanying Memorandum of Points and Authorities, the pleadings, papers and exhibits filed herein, including those filed *ex parte* and *in camera*, and such oral argument as the Court may entertain.

Dated: March 7, 2019.

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