

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

GHASSAN ALASAAD, NADIA )  
ALASAAD, SUHAIB ALLABABIDI, SIDD )  
BIKKANNAVAR, JÉRÉMIE DUPIN, )  
AARON GACH, ISMAIL ABDEL-RASOUL )  
AKA ISMA'IL KUSHKUSH, DIANE )  
ZORRI, ZAINAB MERCHANT, )  
MOHAMMED AKRAM SHIBLY, AND )  
MATTHEW WRIGHT, )

Plaintiffs, )

v. )

KEVIN K. MCALEENAN, ACTING )  
SECRETARY OF THE DEPARTMENT OF )  
HOMELAND SECURITY, IN HIS )  
OFFICIAL CAPACITY; JOHN P. )  
SANDERS, CHIEF OPERATING OFFICER )  
AND SENIOR OFFICIAL PERFORMING )  
THE FUNCTIONS AND DUTIES OF THE )  
COMMISSIONER OF U.S. CUSTOMS )  
AND BORDER PROTECTION, IN HIS )  
OFFICIAL CAPACITY; AND MARK A. )  
MORGAN, ACTING DIRECTOR OF U.S. )  
IMMIGRATION AND CUSTOMS )  
ENFORCEMENT, IN HIS OFFICIAL )  
CAPACITY, )

Defendants. )

Civil Action No. 17-cv-11730-DJC

Hon. Denise J. Casper

**DEFENDANTS'S RESPONSE TO PLAINTIFF'S SUPPLEMENTAL  
STATEMENT OF UNDISPUTED MATERIAL FACTS**

125.1. On July 6, 2019, Suhaib Allababidi arrived at the Toronto airport for a flight to Dallas. Exh. 53 (7/11/19 Allababidi Dec.) at ¶ 1. He traveled with a smartphone and a laptop. *Id.*

at ¶¶ 3-4, 7-8. At the Toronto preclearance area, U.S. Customs and Border Protection (“CBP”) searched both Allababidi’s phone and laptop. *See id.* at ¶¶ 3-10.

**Defendants’ Response:** No dispute.

Dated: July 15, 2019

Respectfully submitted:

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