

No. 17-1351

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# United States Court of Appeals for the Fourth Circuit

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*International Refugee Assistance Project, ET AL.,  
Plaintiffs-Appellees,*

*v.*

*Donald J. Trump, ET AL.,  
Defendants-Appellants.*

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On Appeal from the United States District Court for the  
District of Maryland

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**MOTION BY IMMIGRATION REFORM LAW  
INSTITUTE TO FILE BRIEF AS AMICUS CURIAE  
IN SUPPORT OF DEFENDANTS-APPELLANTS  
AND REVERSAL**

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The Immigration Reform Law Institute (IRLI) respectfully requests leave to file an *amicus curiae* brief in support of defendants-appellants and reversal of the decision below. The brief is attached as Exhibit 1 hereto.

*Amicus curiae* the Immigration Reform Law Institute (IRLI) is a non-profit 501(c)(3) public interest law firm dedicated to litigating immigration-related cases on behalf of, and in the interests of, United States citizens and lawful permanent residents, and also to assisting courts in understanding and accurately applying federal immigration law. IRLI has litigated or filed *amicus curiae* briefs in a wide variety of cases, including *Wash. All. of Tech. Workers v. U.S. Dep't of Homeland Sec.*, 74 F. Supp. 3d 247 (D.D.C. 2014); *Save Jobs USA v. U.S. Dep't of Homeland Sec.*, No. 16-5287 (D.C. Cir. filed Sept. 28, 2016); *Keller v. City of Fremont*, 719 F.3d 931 (8th Cir. 2013); and *Texas v. United States*, 787 F.3d 733 (5th Cir. 2015). IRLI is considered an expert in immigration law by the Board of Immigration Appeals, which has solicited *amicus* briefs drafted by IRLI staff for its parent organization, the Federation for American Immigration Reform (FAIR), for more than twenty years. *See, e.g., Matter of Silva-Trevino*, 26 I. & N. Dec. 99 (B.I.A. 2016); *Matter of C-T-L-*, 25 I. & N. Dec. 341 (B.I.A. 2010).

IRLI proposes to submit its *amicus curiae* brief to assist this Court in understanding the severe and far-reaching shortcomings of the Establishment Clause holding of the court below, and also how the comprehensive statutory

scheme that comprises federal immigration law fully supports the president's instant exercise of authority. IRLI has often provided similar assistance in understanding this same statutory scheme to the Board of Immigration Appeals, upon specific request by that body, because of IRLI's unusual expertise in immigration law. *See, e.g., Matter of Silva-Trevino*, 26 I. & N. Dec. 99 (B.I.A. 2016); *Matter of C-T-L-*, 25 I. & N. Dec. 341 (B.I.A. 2010); and *In re Q- T- -- M-T-*, 21 I. & N. Dec. 639 (B.I.A. 1996). Accordingly, IRLI is an appropriate *amicus curiae* in this matter.

All parties to this litigation have consented to the filing of the attached brief.

DATED: March 31, 2017.

\s\ Christopher J. Hajec  
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## CERTIFICATE OF SERVICE

I certify that on March 31, 2017, the foregoing motion for leave to file an *amicus curiae* brief was served on all parties or their counsel of record through the CM/ECF system.

/s/ Christopher J. Hajec  
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