

IN THE
UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

STATE OF WASHINGTON, <i>et al.</i> ,)	
)	
)	
Plaintiffs-Appellees,)	
)	
v.)	No. 17-35105
)	
DONALD J. TRUMP,)	
President of the United States, <i>et al.</i>)	
)	
Defendants-Appellants.)	

MOTION FOR LEAVE TO FILE BRIEF AS AMICI CURIAE

Amici Curiae U.S. Justice Foundation, Citizens United, Citizens United Foundation, English First Foundation, English First, Public Advocate of the United States, Gun Owners Foundation, Gun Owners of America, Conservative Legal Defense and Education Fund, U.S. Border Control Foundation, and Policy Analysis Center hereby move for leave to file a brief *amicus curiae* in support of the Defendants-Appellants’ Motion for Stay Pending Appeal. It is hereby stated as follows:

1. All parties consent to the filing of this *amicus* brief.
2. As stated more fully in the attached brief, *amici curiae* have extensive experience with respect to the issues presented by this case, and have an

significant interest in the outcome of this case. *Amici* believe that this brief will be of assistance to the Court in deciding the Motion for Stay Pending Appeal

WHEREFORE, we respectfully request that this Court grant leave to file an *amicus curiae* brief in support of Defendants-Appellants' Motion for Stay Pending Appeal.

Respectfully submitted,

/s/ Herbert W. Titus

Herbert W. Titus

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February 6, 2017

CERTIFICATE OF COMPLIANCE WITH RULE 27(d)(2)(A)

IT IS HEREBY CERTIFIED:

1. That the foregoing Motion for Leave to Brief as *Amici Curiae* complies with the type-volume limitation of Rule 27(d)(2)(A), Federal Rules of Appellate Procedure, because this motion contains 157 words, excluding the parts of the brief exempted by Rule 32(f).

2. This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using WordPerfect version 18.0.0.200 in 14-point Times New Roman.

/s/ Herbert W. Titus
Herbert W. Titus
Attorney for *Amici Curiae*
U.S. Justice Foundation, *et al.*

Dated: February 6, 2017

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing Motion for Leave to Brief as *Amici Curiae*, was made, this 6th day of February 2017, by the Court's Case Management/ Electronic Case Files system upon the attorneys for the parties.

/s/ Herbert W. Titus
Herbert W. Titus
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