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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**
13 **SACRAMENTO DIVISION**
14

15 THE UNITED STATES OF AMERICA,
16
Plaintiff,

17 v.

18 THE STATE OF CALIFORNIA; EDMUND
GERALD BROWN JR., GOVERNOR OF
19 CALIFORNIA, IN HIS OFFICIAL
CAPACITY; AND XAVIER BECERRA,
20 ATTORNEY GENERAL OF CALIFORNIA,
IN HIS OFFICIAL CAPACITY,
21
Defendants.

Case No. 2:18-cv-00490-JAM-KJN

**UNOPPOSED MOTION FOR LEAVE TO
FILE BRIEF AMICI CURIAE FOR
TAHIRIH JUSTICE CENTER, ET AL., IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION AND
DEFENDANTS' MOTION TO DISMISS;
[PROPOSED] ORDER**

Hearing Date: June 20, 2018
Hearing Time: 10:00 a.m.
Location: Courtroom 6

Judge: Hon. John A. Mendez
Action Filed: March 6, 2018

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1 immigrant women survivors of gender-based crimes in California, as well as national policy
2 organizations that advocate for legal and other protections for survivors of gender-based crimes
3 in the United States.

4 **III. AMICI'S PERSPECTIVE WILL BENEFIT THE COURT**

5 Based on their extensive work with survivors of gender-based violence, amici have special
6 insight into the ways in which the challenged California laws, S.B. 54, A.B. 103, and A.B. 450,
7 promote the safety of immigrant survivors and improve community safety, by encouraging survivors
8 to report gender-based violence and other criminal activity that may threaten society at large. Amici
9 also have a unique understanding of the harms that an injunction of these laws would cause
10 immigrant women and girls who are survivors of gender-based violence. The public safety concerns
11 which prompted the California legislature to adopt S.B. 54, A.B. 103, and A.B. 450 apply with
12 unique force to immigrant women who are survivors of gender-based violence, as amici's brief
13 explains.
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16 **IV. CONCLUSION**

17 Accordingly, the Tahirih Justice Center, et al., request leave to file the attached brief amici
18 curiae in this action.
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CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2018, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

By: /s/ JAMIE S. GORELICK
JAMIE S. GORELICK