

1 The City of New York along with 20 cities and counties from across the county and the
2 United States Conference of Mayors move this Court for leave to file the attached amici curiae
3 brief in opposition to Plaintiff’s motion for a preliminary injunction and in support of
4 Defendants’ motion to dismiss.¹ Counsel for proposed amici conferred with counsel for the
5 parties, who have consented to this motion. A proposed order has been submitted with this
6 motion.

7 As the front-line providers of government services to communities with substantial
8 immigrant populations, proposed amici have a unique and valuable perspective on both the
9 need for and effect of the so-called sanctuary policies that the Department of Justice challenges
10 in this lawsuit. Our experience refutes the DOJ’s repeated suggestion that such policies are
11 nothing more than an attempt to obstruct federal immigration enforcement. To the contrary, we
12 have found that creating and maintaining appropriate firewalls between local public service
13 providers and federal immigration enforcement is critical to building the trust with our
14 residents that is required to effectively protect the safety and health of all.

15 Amici, who represent nearly 20 million residents from across the nation, believe that we
16 can provide helpful information and perspectives that will assist the Court in deciding the
17 matters before it. As set forth more fully in the attached brief, we will demonstrate the
18 importance of policies limiting the sharing of information with federal immigration authorities
19 to ensuring that all residents are willing to report crime and assist the police, complain about
20 unsafe conditions, send their children to school, and seek medical treatment. When immigrant
21 communities do not trust their local governments not to use their personal information to aid
22 federal immigration enforcement, these essential public services have suffered. In contrast,
23 where sensitive information is protected to the utmost of the local jurisdiction’s ability, all
24 residents feel more secure in engaging with public officials. The practical experience of amici
25 makes clear that local governments are safer and more prosperous when we protect the
26 confidential information of all our residents and keep our services independent from federal

27 ¹ No proposed amici is owned by any publicly held company.
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1 immigration efforts. As the brief argues, federal immigration law does not require that local
2 governments sacrifice their ability to provide these essential public services.

3 **CONCLUSION**

4 The proposed amici respectfully request that this Court grant this unopposed motion and
5 accept for filing the attached amici curiae brief opposing Plaintiff's motion for a preliminary
6 injunction and supporting Defendants' motion to dismiss.

7
8 Respectfully submitted,

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 18, 2018, I filed the foregoing document with the Clerk of
3 the Court via CM/ECF, which automatically sends notice of the filing to all counsel of record. I
4 declare under 28 U.S.C. § 1746 that the above is true and correct.

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