

1 MANATT, PHELPS & PHILLIPS, LLP  
 2 ESRA A. HUDSON, Bar No. CA 202881  
 3 EHudson@manatt.com  
 4 DIANA I. IORLANO, Bar No. CA 193359  
 5 DIorlano@manatt.com  
 6 JADE H. LEUNG, Bar No. CA 279651  
 7 JLeung@manatt.com  
 8 MICHAEL G. NORDON, Bar No. CA 317078  
 9 MNordon@manatt.com  
 10 11355 West Olympic Boulevard  
 11 Los Angeles, California 90064-1614  
 12 Telephone: (310) 312-4000  
 13 Facsimile: (310) 312-4224

8 *Attorneys for Amici*  
 9 PICO CALIFORNIA; NATIONAL COUNCIL OF  
 10 JEWISH WOMEN-CALIFORNIA; FRANCISCAN  
 11 ACTION NETWORK; RABBI JONATHAN D.  
 12 KLEIN

11 UNITED STATES DISTRICT COURT  
 12 EASTERN DISTRICT OF CALIFORNIA

14 THE UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 THE STATE OF CALIFORNIA;  
 18 EDMUND GERALD BROWN JR.,  
 19 Governor of California, in his Official  
 20 Capacity; and XAVIER BECERRA,  
 21 Attorney General of California, in his  
 22 Official Capacity,

23 Defendants.

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

**CONSENT MOTION OF *AMICI CURIAE*  
 FAITH-BASED ORGANIZATIONS FOR  
 LEAVE TO FILE *AMICI CURIAE* BRIEF  
 IN SUPPORT OF DEFENDANTS'  
 OPPOSITION TO PRELIMINARY  
 INJUNCTION**

Judge: Hon. John A. Mendez

NO HEARING NOTICED

1                                    **CONSENT MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF<sup>1</sup>**

2                    Proposed *amici curiae* are the following U.S. faith-based organizations and persons whose  
3 work includes advocating for or providing aid and resources to recent U.S. immigrants and their  
4 families: PICO California; Franciscan Action Network (“FAN”); National Council of Jewish  
5 Women-California (“NCJW”); and Rabbi Jonathan D. Klein, Executive Director of Clergy and  
6 Laity United for Economic Justice (“CLUE”) (collectively, “Amici”). Counsel for all parties  
7 have consented to the filing of the brief, and no party opposes the granting of this motion. A  
8 proposed order has been submitted with this motion.

9                    District courts have broad discretion regarding appointment of an amicus curiae.  
10 *Hoptowitt v. Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982). The case before this Court, and the  
11 preliminary injunction sought by Plaintiff, implicates issues of general public interest. Amici  
12 submit this brief to provide the Court with their distinct perspective on why the injunction is  
13 contrary to the public interest. If Plaintiff’s motion for preliminary injunction is granted, Amici,  
14 and members of their congregations, as well as the public overall, will suffer. An injunction of  
15 California’s Immigration Worker Protection Act, Dignity Not Detention Act, and California  
16 Values Act (collectively, the “Challenged Statutes”), will cause faith-based organizations and  
17 their representatives, such as Amici, from providing religious sanctuary to the most vulnerable  
18 members of their communities. An injunction would prevent Amici from living in accordance  
19 with their basic religious principles and tenets.

20                    Accordingly, for the above-stated reasons, Amici respectfully request that this Court grant  
21 this unopposed motion and accept for filing the attached amicus curiae brief supporting  
22 Defendant’s Opposition to Plaintiff’s motion for a preliminary injunction.

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27 <sup>1</sup> This brief is filed with consent of all parties. No party’s counsel authored this brief in whole or in part. No party or  
28 party’s counsel contributed money that was intended to fund preparation or submission of this brief, and no person  
other than the amici curiae or their counsel contributed money that was intended to fund preparation or submission of  
this brief.

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**CORPORATE DISCLOSURE STATEMENT**

Proposed amici curiae are all non-profit organizations or individual clergymen and women. No member of proposed *amici curiae* has a parent corporation and no publicly held corporation owns any portion of it.

Dated: May 18, 2018

Respectfully submitted,  
  
/s/Esra Acikalin Hudson  
Esra A Hudson  
Diana I. Iorlano  
Jade H. Leung  
Michael G. Nordon  
MANATT, PHELPS & PHILLIPS, LLP  
11355 W. Olympic Blvd.  
Los Angeles, CA 90064  
(310) 312-4000 / Fax (310) 312-4224  
Counsel For *Amici Curiae*

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2018, I electronically filed the foregoing motion for leave to file and proposed order, together with the accompanying *amici curiae* brief and an addendum, with the Clerk of the Court for the United States District Court for the Eastern District of California. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Parties may access this filing through the Court’s CM/ECF system.

/s/ Esra Acikalin Hudson  
Council for *Amici Curiae*