Richard Mancino (pro hac vice) rmancino@willkie.com Shussein@willkie.com Matthew Dollan (pro hac vice) shussein@willkie.com Matthew Dollan (pro hac vice) mollan@wilkie.com Mult.Kit FARR & GALLAGHER LLP 787 Seventh Avenue New York, NY 10019 Telephone: (212) 728-8000 Facsimile: (212) 728-9000 Richard D. Bernstein (pro hac vice pending) 1875 K Street, N.W. Washington, D.C. 20006-1238 Telephone: (301) 775-2064 remsteinlaw@mail.com Counsel for Amici Curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION TATE OF CALIFORNIA, et al., Plaintiffs, v. DONALD J. TRUMP, in his official capacity as President of the United States of America, et al., Defendants. Defendants. Defendants. David W. Evans HAIGHT BROWN & BONESTEEL Three Embarcadero Center, Suite 200 San Francisco, CA 94111 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com San Francisco, CA 94111 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com New York, NY 10019 Telephone: (210) 728-8000 Facsimile: (415) 546-7505 devans@hbblaw.com New York, NY 10019 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com New York, NY 10019 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com New York, NY 10019 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com New York, NY 10019 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com New York, NY 10019 Telephone: (415) 281-7624 Facsimile: (415) 546-7505 devans@hbblaw.com NorTHERN DOLLAN'S NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR AMIC! CURIAG CHRISTOPHER SHAYS, CHRISTINE TODD WHITMAN, PETER KEISLER, CARTER PHILLIPS, JOHN BELLINGER III, STANLEY TWARDY, AND RICHARD BERNSTEIN; PROPOSED ORDER GRANTING MOTION TO WITHDRAW Case No. 4:19-CV-00872-HSG	1			
Shaimaa M. Hussein (pro hac vice) shussein@willkie.com Matthew Dollan (pro hac vice) mdollan@willkie.com WILLKIE FARR & GALLAGHER LLP 787 Seventh Avenue New York, NY 10019 Telephone: (212) 728-8000 Facsimile: (212) 728-9000 Richard D. Bernstein (pro hac vice pending) 1875 K Street, N.W. Washington, D.C. 20006-1238 Telephone: (301) 775-2064 rbernsteinlaw@gmail.com Counsel for Amici Curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION STATE OF CALIFORNIA, et al., Plaintiffs, v. DONALD J. TRUMP, in his official capacity as President of the United States of America, et al., Defendants. MATTHEW DOLLAN'S NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR AMICI CURIAE CHRISTOPHER SHAYS, CHRISTINE TODD WHITMAN, PETER KEISLER, CARTER PHILLIPS, JOHN BELLINGER III, STANLEY TWARDY, AND RICHARD BERNSTEIN; PROPOSED ORDER GRANTING MOTION TO WITHDRAW Case No. 4:19-CV-00872-HSG				
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New York, NY 10019 Telephone: (212) 728-8000 Facsimile: (212) 728-9000 Richard D. Bernstein (pro hac vice pending) 1875 K Street, N.W. Washington, D.C. 20006-1238 Telephone: (301) 775-2064 rbernsteinlaw@gmail.com Counsel for Amici Curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION STATE OF CALIFORNIA, et al., Plaintiffs, v. DONALD J. TRUMP, in his official capacity as President of the United States of America, et al., Defendants. Defendants. MATTHEW DOLLAN'S NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR AMICI CURIAE CHRISTOPHER SHAYS, CHRISTINE TODD WHITMAN, PETER KEISLER, CARTER PHILLIPS, JOHN BELLINGER III, STANLEY TWARDY, AND RICHARD BERNSTEIN; PROPOSED ORDER GRANTING MOTION TO WITHDRAW Case No. 4:19-CV-00872-HSG	4	WILLKIE FARR & GALLAGHER LLP		
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DONALD J. TRUMP, in his official capacity as President of the United States of America, et al., Defendants. Defendants. CHRISTINE TODD WHITMAN, PETER KEISLER, CARTER PHILLIPS, JOHN BELLINGER III, STANLEY TWARDY, AND RICHARD BERNSTEIN; PROPOSED ORDER GRANTING MOTION TO WITHDRAW Case No. 4:19-CV-00872-HSG		Plaintiffs,		
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SIERRA CLUB and SOUTHERN BORDER COMMUNITIES COALITION,

Plaintiffs,

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DONALD J. TRUMP, President of the United States, in his official capacity, et al.,

Defendants.

Case No. 4:19-CV-00892-HSG

NOTICE OF MOTION

PLEASE TAKE NOTICE that Matthew Dollan, of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, NY 10019, shall and hereby does respectfully seek leave of this Court, pursuant to LOCAL R. 11-5(a) and in compliance with CAL. R. PROF. CONDUCT 3-700, to withdraw as counsel for amici curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein.

MOTION TO WITHDRAW AS COUNSEL FOR AMICI CURIAE

Pursuant to LOCAL R. 11-5, Matthew Dollan ("Movant") hereby notifies the parties and the Court of his intent to withdraw as counsel pro hac vice for amici curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein. Movant offers the following grounds for this notice and motion:

- 1. This Court granted Movant leave to appear pro hac vice in this action pursuant to its May 2, 2019, Order.
- 2. Movant has represented amici curiae as part of his employment at Willkie Farr Gallagher LLP. As of May 9, 2019, Movant will no longer be employed as an attorney at Willkie Farr Gallagher LLP.
- 3. Willkie Farr Gallagher LLP attorneys Richard Mancino and Shaimaa Hussein, and attorney Richard Bernstein, also represent amici curiae and will continue to do so.
 - 4. Movant's withdrawal will not cause any prejudice or delay in this case. All parties have counsel

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actively representing them, and none will require any additional time to review or acclimate to the absence of Movant as counsel *pro hac vice*.

5. Given the insubstantial nature of this Motion, as well as the substantial burden to all parties in travelling and attending a hearing on this Motion, Movant respectfully requests that the Court waive oral argument.

THEREFORE, Movant Matthew Dollan respectfully requests that this Court waive oral argument on this Motion, grant him leave to withdraw as counsel *pro hac vice* in the above-captioned matter, and enter an order stating that Movant has so withdrawn.

Respectfully submitted,

787 Seventh Ave

New York, NY 10019

Telephone: (202) 728-8000 Facsimile: (202) 728-9000

/s/ Matthew Dollan

WILLKIE FARR & GALLAGHER LLP

Matthew Dollan (pro hac vice)

Dated: May 8, 2019

David W. Evans

HAIGHT BROWN & BONESTEEL

Three Embarcadero Center, Suite 200

San Francisco, CA 94111 Telephone: (415) 281-7624

Facsimile: (415) 546-7505

Richard Mancino (pro hac vice)

Shaimaa M. Hussein (pro hac vice)

WILLKIE FARR & GALLAGHER LLP

787 Seventh Ave New York, NY 10019

Telephone: (202) 728-8000

Facsimile: (202) 728-9000

Richard D. Bernstein (pro hac vice pending)

1875 K Street, N.W.

Washington, D.C. 20006-1238

Telephone: (301) 775-2064

Counsel for Amici Curiae Christopher Shays, Christine Todd Whitman, Peter Keisler, Carter Phillips, John Bellinger III, Stanley Twardy, and Richard Bernstein

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2019, I caused the foregoing document to be filed via the U.S. District Court for the Northern District of California's CM/ECF system, which I understand caused service on all registered parties.

/s/ Matthew Dollan
Matthew Dollan