

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

_____	)	
ROY COCKRUM; SCOTT COMER; and,	)	
ERIC SCHOENBERG,	)	
	)	
Plaintiffs,	)	
	)	Civil Action No. 1:17-CV-1370-ESH
v.	)	
	)	
DONALD J. TRUMP FOR PRESIDENT,	)	
INC.; and ROGER STONE,	)	
	)	
Defendants.	)	
_____	)	

**UNOPPOSED MOTION OF CAMPAIGN LEGAL CENTER AND PROFESSOR  
THEODORE M. SHAW FOR LEAVE TO FILE BRIEF AS AMICI CURIAE IN  
OPPOSITION TO DEFENDANTS’ MOTIONS TO DISMISS PLAINTIFFS’ FIRST  
AMENDED COMPLAINT**

Pursuant to LCvR 7(o), Campaign Legal Center and Professor Theodore M. Shaw, through undersigned counsel, respectfully move for leave to file the accompanying brief as amici curiae in opposition to the defendants’ motions to dismiss Plaintiffs’ First Amended Complaint.

Amicus curiae, Campaign Legal Center (CLC), is a nonpartisan nonprofit organization that has been working for fifteen years to advance democracy through law. Amicus CLC has litigated many voting rights cases in federal courts, including as arguing counsel for the plaintiffs in the recent United States Supreme Court case, *Gill v. Whitford*, No. 16-1161, as counsel for plaintiffs in *Veasey v. Abbott*, 830 F.3d 216 (5th Cir. 2016) (challenging Texas's photo ID law), and as counsel for plaintiffs in *LULAC v. Reagan*, No. 2:17-cv-04102 (D. Ariz. 2017) (challenging Arizona's dual registration system). CLC has filed amicus curiae briefs in every major voting rights case before the Supreme Court in recent years including *Cooper v. Harris*, 137 S. Ct. 1455 (2017), *Evenwel v. Abbott*, 136 S. Ct. 1120 (2016), and *Shelby County v. Holder*, 133 S. Ct. 2612 (2013).

Amicus curiae, Professor Theodore M. Shaw, is the Julius L. Chambers Distinguished Professor of Law at the University of North Carolina School of Law, where he teaches courses on the equal protection clause of the Fourteenth Amendment, and the civil rights statutes from the Reconstruction era. Professor Shaw was the fifth Director-Counsel and President of the NAACP Legal Defense and Educational Fund, Inc. (“LDF”), for which he worked in various capacities over the span of twenty-six years. He has litigated education, employment, voting rights, housing, police misconduct, capital punishment, and other civil rights cases in trial and appellate courts, and before the United States Supreme Court. From 1982 until 1987, he litigated education, housing, and capital punishment cases, and directed LDF’s education litigation docket. In 1987, under the direction of LDF’s third Director-Counsel, Julius Chambers, Mr. Shaw relocated to Los Angeles to establish LDF’s Western Regional Office. In 1990, Mr. Shaw left LDF to join the faculty of the University of Michigan Law School. In 1993, Mr. Shaw returned to LDF as Associate Director-Counsel, and in 2004, he became LDF’s fifth Director-Counsel. Mr. Shaw’s legal career began as a Trial Attorney in the Honors Program of the United States Department of Justice, Civil Rights Division in Washington, D.C., where he worked from 1979 until 1982.

CLC and Professor Shaw seek leave to file a brief as amici curiae because this case directly implicates issues of fundamental concern to them. Amici have a demonstrated interest in the protection of civil rights and the health of our representative democracy, and thus the interpretation and application of 42 U.S.C. § 1985(3) to conduct that intimidates people from offering their support or advocacy of candidates for federal office or injures people on account of such support or advocacy.

Amici believe that their brief may be of assistance to the Court by identifying and concisely discussing critical legal issues that are central to the case and by highlighting the potential consequences of the theories advanced by the Defendants.

### CONCLUSION

For the foregoing reasons, the movants respectfully request that their motion for leave to file a brief as amici curiae be granted, and that the Court order that the accompanying brief be filed in this case.

Dated this 8th day of December 2017.

Respectfully submitted,

/s/ Paul M. Smith

Paul M. Smith, DC Bar No. 358870  
CAMPAIGN LEGAL CENTER  
1411 K Street, NW, Suite 1400  
Washington, D.C. 20005  
Tel.: (202) 736-2200

Ruth M. Greenwood (*pro hac vice pending*)  
CAMPAIGN LEGAL CENTER  
73 W Monroe St, Suite 322  
Chicago, IL 60603  
Tel.: (312) 561-5508

*Counsel for Amici Curiae*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2017, I electronically filed the foregoing Motion with supporting Brief and Proposed Order with the Clerk of the Court of the U.S. District Court of the District of Columbia by using the CM/ECF system, which will accomplish electronic notice and service for all counsel of record.

/s/ Paul M. Smith  
Paul M. Smith  
CAMPAIGN LEGAL CENTER  
1411 K Street, NW, Suite 1400  
Washington, D.C. 20005  
Tel.: (202) 736-2200

Dated: December 8, 2017