

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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:  
Georgia Latino Alliance for Human Rights, :  
*et al.* :  
:  
Plaintiffs, :  
:  
vs. :  
Governor Nathan Deal, *et al.*, :  
:  
Defendants. :  
:  
----- X

No. 1:11-cv-1804-TWT

**MOTION OF THE  
UNITED MEXICAN STATES  
AS AMICUS CURIAE  
FOR LEAVE TO FILE  
BRIEF IN SUPPORT OF  
PLAINTIFFS' COMPLAINT  
FOR DECLARATORY AND  
INJUNCTIVE RELIEF**

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**MOTION OF *AMICUS CURIAE* FOR LEAVE TO FILE  
BRIEF IN SUPPORT OF PLAINTIFF**

As *Amicus Curiae*, the United Mexican States (“Mexico”), respectfully moves for leave of Court to file the accompanying brief.<sup>1</sup> *Amicus Curiae* has two significant sovereign interests impinged by the Defendants’ actions.

Mexico has a substantial and compelling interest in ensuring that its bilateral diplomatic relations with the government of the United States of America (“U.S.”) be transparent, consistent and reliable, and not frustrated by the actions of individual U.S. states, herein Georgia and its government officials.

*Amicus Curiae*’s substantial and compelling interest also encompasses ensuring that its citizens are accorded human and civil rights when present in the United States in accordance with the U.S. Constitution and federal immigration law. In particular, Mexico has an interest in protecting its citizens and ensuring that their ethnicity is not used as basis for state-sanctioned acts of bias and discrimination. Therefore, *Amicus Curiae* respectfully requests that the Court grant leave to file this brief.

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<sup>1</sup> No person other than *Amicus Curiae* or its counsel authored this brief in whole or in part, or made a monetary contribution to its preparation or submission. Counsel for Plaintiff has consented to the filing of this brief.

Respectfully submitted, this 15<sup>th</sup> day of June 2011, by counsel for *Amicus*

*Curiae*,

/s/ *Emmet J. Bondurant*

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**CERTIFICATE OF COMPLIANCE  
WITH LOCAL RULE 5.1**

Pursuant to LR 5.1 and 7.1D, I hereby certify that the attached Motion complies with the typeface and the type style requirements of LR 5.1. This motion was prepared in Times New Roman 14-point font

*/s/ Emmet J. Bondurant* \_\_\_\_\_

Emmet J. Bondurant

## CERTIFICATE OF SERVICE

I, Emmet J. Bondurant, hereby certify that on this 15th day of June 2011, I electronically filed the foregoing Motion of the United Mexican State as *Amicus Curiae* for leave to file Brief in Support of Plaintiffs Complaint for Declaratory and Injunctive Relief and attached Brief with the Clerk of the Court using the CM/ECF system, which sent notification to the following:

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This 15<sup>th</sup> day of June, 2011.

*/s/ Emmet J. Bondurant*

Emmet J. Bondurant