

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 FOR LEAVE TO
JOIN BRIEF OF THE
UNITED MEXICAN STATES
AS AMICUS CURIAE IN
SUPPORT OF PLAINTIFFS**

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**MOTION FOR LEAVE TO JOIN BRIEF OF
THE UNITED MEXICAN STATES
AS AMICUS CURIAE
IN SUPPORT OF PLAINTIFFS**

The Governments of Argentina, Brazil, Chile, Colombia, Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and Peru (collectively, the “Governments”) respectfully file this motion for leave of Court to join the *amicus curiae* brief filed by the United Mexican States (“Mexico”) on June 15, 2011, expressing grave concerns over Georgia’s immigration law, House Bill 87 (“HB 87”) and underscoring the importance of preliminarily enjoining HB 87 and declaring it unconstitutional in its entirety.

Mexico and the Governments share a commonality of interests – differing not in substance, but merely in proportionality and degree of impact – with regard to HB 87. Similar to Mexico, the Governments have a substantial and compelling interest in ensuring that their respective bilateral diplomatic relations with the government of the United States of America (“United States” or “U.S.”) are transparent, consistent and reliable, and not frustrated by the actions of individual U.S. states; in this case Georgia. As with U.S.–Mexico relations, HB 87 raises substantial challenges to the bilateral economic, immigration and security policies of the United States and the Governments.

Furthermore, the Governments have a substantial and compelling interest to ensure that their citizens are accorded human and civil rights when present in the United States in accordance with international treaties, the U.S. Constitution, and federal immigration law. Like Mexico, the Governments are gravely concerned that HB 87 will lead to racial profiling and disparate treatment of their nationals. Accordingly, the Governments have a substantial and compelling interest to ensure that the ethnicity of their citizens is not used as basis for state-sanctioned acts of discrimination.

As such, the Governments have a compelling interest in seeing that HB 87 be preliminarily enjoined and declared unconstitutional in its entirety.

Respectfully submitted, this 15th day of June 2011, by counsel for *Amicus Curiae*,

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CERTIFICATE OF SERVICE

I, Emmet J. Bondurant, hereby certify that on this 15th day of June 2011, I electronically filed the foregoing Motion for Leave to Join Brief of the United Mexican States as *Amicus Curiae* with the Clerk of the Court using the CM/ECF system, which sent notification to the following:

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