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(See Next Page For Additional Counsel)

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

STATE OF HAWAII and ISMAIL ELSHIKH,

Plaintiffs,

v.

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

Defendants.

CASE NO. 1:17-cv-50-DKW-KJM

AMERICAN CENTER FOR LAW & JUSTICE'S MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF; MEMORANDUM IN SUPPORT; DECLARATION OF ROBERT MATSUMOTO (Ex. A); PROPOSED AMICUS CURIAE BRIEF (Ex. B); CERTIFICATE OF SERVICE

AMERICAN CENTER FOR LAW & JUSTICE'S MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF SUPPORTING DEFENDANTS

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The American Center for Law & Justice ("ACLJ") respectfully requests that this Court grant it leave to file the attached proposed *amicus curiae* brief (Exhibit B) in support of Defendants' opposition to Plaintiffs' motion for a temporary restraining order. Counsel for Plaintiffs consent to the granting of the motion and counsel for Defendants take no position on the motion, as explained in the attached declaration of Attorney Robert K. Matsumoto. (Exhibit A.)

As set forth more fully in the supporting memorandum of law, this Court has broad discretion to grant *amicus* status to the ACLJ, and the *amicus curiae* brief of the ACLJ will assist this Court in deciding the pending motion for a temporary restraining order as the brief provides unique information and perspective.

The motion is based on Fed. R. Civ. P. 7 and LR. 7, as well as on the attached memorandum of law, the attached the declaration of Attorney Robert K. Matsumoto (Exhibit A), the attached proposed *amicus curiae* brief (Exhibit B), and the record and files in this case.

ACCORDINGLY, for the above-stated reasons, and those in the supporting memorandum of law, the ACLJ respectfully requests that this Court grant this motion and enter an order accepting for filing the ACLJ's attached *amicus curiae* brief supporting Defendants' opposition to Plaintiffs' motion for a temporary restraining order.

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¹ The American Center for Law & Justice is a non-profit organization. It has no parent corporation and no publicly held corporation owns any portion of it.

Dated: March 13, 2017.

Respectfully submitted,

/s/ Robert K. Matsumoto

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