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IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF HAWAII

STATE OF HAWAII, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Civil Action No. 1:17-cv-00050-
 DKW-KSC

**MOTION FOR LEAVE TO FILE BRIEF
 OF CHICAGO, LOS ANGELES, NEW
 YORK, PHILADELPHIA, AND OTHER
 MAJOR CITIES AND COUNTIES AS
 AMICI CURIAE IN SUPPORT OF
 PLAINTIFFS' MOTION TO CONVERT
 THE TEMPORARY RESTRAINING
 ORDER TO A PRELIMINARY
 INJUNCTION (Dkt. 238)**

Hearing March 29, 2017, 9:30 a.m.

Honorable Derrick K. Watson

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Chicago, Los Angeles, New York, Philadelphia, and other major U.S. cities and counties respectfully submit this motion for leave to file a brief *amicus curiae* in support of Plaintiffs' motion to convert the temporary restraining order to a preliminary injunction.

1. Amici include the largest cities and counties in the United States. Along with other cities across the country, our physical and economic security is damaged by Executive Order 13780, issued on March 6, 2017, and entitled "Protecting the Nation from Foreign Terrorist Entry into the United States," as we describe in our brief.

2. The proposed *amicus* brief explains how the Order's discrimination on the basis of religion and national origin will significantly undermine the safety, economic well-being, and social cohesion in our communities and across the United States.

3. Plaintiffs have consented to this motion. Defendants take no position on our request to file an *amicus* brief.

WHEREFORE, *amici* respectfully request that this Court grant them leave to file the *amicus* brief attached hereto.

Dated: March 23, 2017

Respectfully submitted,

s/Benna Ruth Solomon

s/Robert M. Kohn

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