

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, et al.,)	
)	
Plaintiffs,)	
)	Civil Action No.
vs.)	8:17-CV-00361-TDC
)	
DONALD J. TRUMP, et al.,)	
)	
Defendants.)	
)	

**MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO FILE
AMICUS CURIAE BRIEF OF THE
RODERICK AND SOLANGE MACARTHUR JUSTICE CENTER
IN SUPPORT OF PLAINTIFFS' MOTION FOR
A TEMPORARY RESTRAINING ORDER**

The Roderick and Solange MacArthur Justice Center respectfully requests leave to file the attached *amicus curiae* brief in support of Plaintiffs' motion for a temporary restraining order. Plaintiffs consent to the filing of the amicus brief; the Government takes no position on this motion.

The MacArthur Justice Center is a not-for-profit organization founded in 1985 by the family of J. Roderick MacArthur to advocate for human rights and social justice through litigation. The MacArthur Justice Center has represented clients facing a myriad of human rights and civil rights injustices, including issues of discrimination, the unlawful detention of foreign nationals, and the rights of marginalized groups in the United States' justice system. The MacArthur Justice Center has an interest in the independent role of the judiciary in determining whether government officials have acted with discriminatory animus.

The MacArthur Justice Center seeks to submit its brief to inform the Court’s analysis of animus, including through historic information that preceded the present action, and to contextualize this dispute in the history of judicial scrutiny of discriminatory government actions.

The Court has broad discretion to grant leave to file as *amicus curiae*. See *Bryant v. Better Bus. Bureau of Greater Md., Inc.*, 923 F. Supp. 720, 728 (D. Md. 1996). “[T]he aid of *amici curiae* has been allowed at the trial level where they provide helpful analysis of the law” or where “they have a special interest in the subject matter of the suit.” *Id.*; see also *Washington Gas Light Co. v. Prince George’s Cty. Council*, No. DKC 08-0967, 2012 WL 832756, at *3 (D. Md. Mar. 9, 2012).

WHEREFORE, the MacArthur Justice Center respectfully requests leave to file the amicus brief attached as Exhibit 1 to the Motion.

Dated: March 13, 2017

Respectfully submitted,

/s/
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*signed by Veronica Nannis with permission of
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(*Pro Hac Vice* admission pending)

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