

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

INTERNATIONAL REFUGEE
ASSISTANCE PROJECT, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

Civil Action No. TDC-17-0361

**MOTION OF ANTI-DEFAMATION
LEAGUE AND JEWISH COUNCIL
FOR PUBLIC AFFAIRS FOR LEAVE
TO FILE AMICUS CURIAE BRIEF IN
SUPPORT OF PLAINTIFFS**

The Anti-Defamation League (“ADL”) and Jewish Council for Public Affairs (“JCPA”) respectfully move for leave to file an amicus curiae brief in support of the claims of Plaintiffs International Refugee Assistance Project, HIAS, Inc., Allan Hakky, Samaneh Takaloo, and others, challenging the Executive Order signed on January 27, 2017, entitled “Protecting the Nation from Foreign Terrorist Entry into the United States.” Executive Order 13,769, 82 Fed. Reg. 8977 (Feb. 1, 2017). ADL and JCPA’s proposed amicus curiae brief is attached as Exhibit 1.

As explained in the accompanying memorandum of law in support of this motion, ADL provides a unique and important perspective that will assist the Court’s disposition of this case because of ADL’s long-standing experience, expertise and dedication to fighting discrimination, specifically including discrimination with respect to immigrants and religious minorities. ADL is a civil-rights and human-relations organization founded in 1913 to stop the defamation of Jewish people and to secure justice and fair treatment for all people. Through its twenty-six regional offices throughout the United States, ADL provides materials, programs, and services to combat anti-Semitism and all forms of bigotry.

JCPA also has a special interest and will provide a valuable perspective helpful to the Court in this case because JCPA supports an open admissions policy in the United States that maintains the pluralistic character of American society and opposes preferences for one national group at the expense of another. JCPA is the coordinating body of 16 national Jewish organizations and 125 local Jewish federations and community relations councils. Founded in 1944, JCPA is dedicated to safeguarding the rights of Jews throughout the world; upholding the safety and security of the State of Israel; and protecting, preserving, and promoting a just, democratic, and pluralistic society.

Accordingly, ADL and JCPA respectfully request that the Court grant them leave to appear as amici curiae and allow the filing of ADL and JCPA's proposed amicus curiae brief.

Dated: March 3, 2017

Respectfully submitted,

Of counsel:

John B. Harris
Jeremy Goldman
Caren Decter
Jessica Smith
Rayna Lopyan
Lily Landsman-Roos
Lakendra Barajas
FRANKFURT KURNIT KLEIN & SELZ, P.C.
488 Madison Avenue
New York, NY 10022

Steven M. Freeman
Lauren A. Jones
Melissa Garlick
Michael Lieberman
ANTI-DEFAMATION LEAGUE
605 Third Avenue
New York, NY 10158

Doron F. Ezickson
ANTI-DEFAMATION LEAGUE
1100 Connecticut Avenue, Northwest, Suite 1020
Washington, DC 20036

Counsel for Anti-Defamation League

David Bohm
DANNA MCKINTRICK, P.C.
7701 Forsyth Blvd., Suite 800
St. Louis, MO 63105

Counsel for Jewish Council for Public Affairs

/s/ David E. Mills

David E. Mills (Bar No. 16654)
Alyssa T. Saunders (*pro hac vice motion
forthcoming*)
COOLEY LLP
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800

*Counsel for Anti-Defamation League and
Jewish Council for Public Affairs*

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2017, a copy of the foregoing was filed electronically through the CM/ECF, which will send a notice of filing to all parties.

/s/ David E. Mills

David E. Mills (Bar No. 16654)

COOLEY LLP

1299 Pennsylvania Avenue, NW, Suite 700

Washington, DC 20004-2400

Telephone: (202) 842-7800

*Counsel for Anti-Defamation League and
Jewish Council for Public Affairs*