

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

INTERNATIONAL REFUGEE
ASSISTANCE PROJECT, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

Civil Action No.: 8:17-CV-00361-TDC

**MOTION FOR LEAVE TO FILE AMICI CURIAE MEMORANDUM
IN SUPPORT OF PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

Amici curiae—a group of nearly fifty interfaith religious and interreligious congregations, associations, and organizations—seek leave to file the attached brief in support of Plaintiff International Refugee Assistance Project's Motion for a Preliminary Injunction of § 5(d) of President Trump's January 27, 2017 Executive Order. Plaintiffs consent to the filing of this brief. Defendants do not take any position on this motion.

District courts have broad discretion whether to grant or deny motions for leave to appear as amicus curiae. *Am. Humanist Ass'n v. Maryland-Nat'l Capital Park & Planning Comm'n*, 303 F.R.D. 266, 269 (D. Md. 2014); *Bryant v. Better Bus. Bureau of Greater Maryland, Inc.*, 923 F. Supp. 720, 728 (D. Md. 1996). “The aid of amici curiae has been allowed at the trial level where they provide helpful analysis of the law, they have a special interest in the subject matter of the suit, or existing counsel is in need of assistance.” *Bryant*, 923 F. Supp. at 728 (granting motion for leave to file a amici curiae brief where amici have “vested interest” in outcome of the case and amici “can be useful in resolving the issues presented by the parties”) (internal citations

omitted); *see also Am. Humanist*, 303 F.R.D. at 269 (allowing amici to submit memorandum where amici “demonstrated a special interest in the outcome of the suit” and the memorandum “provide[d] helpful information to the court”).

Amici have a vested interest in whether this Court enjoins enforcement of § 5(d) of the Executive Order, and offer a unique perspective on the issues in this case. Religious principles have long informed society’s understanding of moral values. Amici have a wide array of beliefs and come from different faith traditions, but are united in their missions to aid those in need. Amici are deeply concerned about the impact of the Executive Order on the most vulnerable refugees. Many amici actively participate in aiding refugees, and several amici are faith-based organizations whose mission is to assist refugees resettling in the United States. Other amici are local congregations that have adopted refugee families, providing them housing as well as financial, emotional, and spiritual support. The Executive Order’s drastic reduction in the number of refugees that will be granted admission to the United States this year runs contrary to religious and moral values common to all faiths, and it will have a profound impact on amici’s ability to continue their faith-based missions.

Because amici have a unique perspective that can aid the Court’s resolution of this matter, amici respectfully request leave to file the brief attached as Exhibit A to this letter.

Dated: March 3, 2017

Respectfully submitted,

MORRISON & FOERSTER LLP

By: /s/ Bradley D. Wine

Bradley D. Wine (bwine@mofocom) (MD Bar # 12577)
Sandeep N. Nandivada (snandivada@mofocom)
1650 Tysons Boulevard
McLean, Virginia 22102
Telephone: 703.760.7700
Facsimile: 703.760.7777

Marc A. Hearn (mhearn@mofocom)
2000 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: 202.887.1500
Facsimile: 202.887.0763

Purvi G. Patel (ppatel@mofocom)
707 Wilshire Boulevard
Los Angeles, California 90017
Telephone: 213.892.5200
Facsimile: 213.892.5454

Jennifer K. Brown (jbrown@mofocom)
Amanda Aikman (aikman@mofocom)
250 West 55th Street
New York, New York 10019
Telephone: 212.468.8000
Facsimile: 212.468.7900

Counsel for Amici Curiae

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March 2017, I filed and served the foregoing via the CM/ECF system on all counsel who are registered CM/ECF users.

Dated: March 3, 2017

/s/Bradley D. Wine

Morrison & Foerster LLP