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**IN THE UNITED STATES DISTRICT COURT  
 DISTRICT OF UTAH, CENTRAL DIVISION**

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UTAH COALITION OF LA RAZA, *et al.*

Plaintiff,

v.

GARY HERBERT, *et al.*

Defendant.

**MOTION OF THE  
 UNITED MEXICAN STATES  
 AS *AMICUS CURIAE*  
 FOR LEAVE TO FILE  
 BRIEF IN SUPPORT OF  
 PLAINTIFFS' COMPLAINT  
 FOR DECLARATORY AND  
 INJUNCTIVE RELIEF**

Case No. 2:11-cv-00401 BCW

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As *Amicus Curiae*, the United Mexican States (“Mexico”), respectfully moves for leave of Court to file the accompanying brief.<sup>1</sup> *Amicus Curiae* has two significant sovereign interests impinged by the Defendants’ actions.

Mexico has a substantial and compelling interest in ensuring that its bilateral diplomatic relations with the government of the United States of America (“U.S.”) be transparent, consistent and reliable, and not frustrated by the actions of individual U.S. states, herein Utah and its government officials.

*Amicus Curiae*’s substantial and compelling interest also encompasses ensuring that its citizens are accorded human and civil rights when present in the United States in accordance with the U.S. Constitution and federal immigration law. In particular, Mexico has an interest in protecting its citizens and ensuring that their ethnicity is not used as basis for state-sanctioned acts of bias and discrimination. Therefore, *Amicus Curiae* respectfully requests that the Court grant leave to file this brief.

DATED this 7<sup>th</sup> day of June, 2011.

**JONES WALDO HOLBROOK & McDONOUGH**

/s/ Lon A. Jenkins  
Lon A. Jenkins (USB #4060)

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<sup>1</sup> No person other than *Amicus Curiae* or its counsel authored this brief in whole or in part, or made a monetary contribution to its preparation or submission. Counsel for Plaintiff-Appellee has consented to the filing of this brief.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of June 2011, I electronically filed the foregoing **MOTION OF THE UNITED MEXICAN STATES AS *AMICUS CURIAE* FOR LEAVE TO FILE BRIEF IN SUPPORT OF PLAINTIFFS' COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF** with the Clerk of the Court using the CM/ECF system, which sent notification to the following:

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