

No. 17-1351

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IN THE  
**United States Court of Appeals**  
**for the Fourth Circuit**

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INTERNATIONAL REFUGEE ASSISTANCE PROJECT, a project of the Urban Justice Center, Inc.,  
on behalf of itself; HIAS, INC., on behalf of itself and its clients; MIDDLE EAST STUDIES  
ASSOCIATION OF NORTH AMERICA, INC., on behalf of itself and its members; MUHAMMED  
METEAB; PAUL HARRISON; IBRAHIM AHMED MOHOMED; JOHN DOES #1 & 3; JANE DOE #2,

*Plaintiffs-Appellees,*

v.

DONALD J. TRUMP, in his official capacity as President of the United States; DEPARTMENT OF  
HOMELAND SECURITY; DEPARTMENT OF STATE; OFFICE OF THE DIRECTOR OF NATIONAL  
INTELLIGENCE; JOHN F. KELLY, in his official capacity as Secretary of Homeland Security; REX  
W. TILLERSON, in his official capacity as Secretary of State; DANIEL R. COATS, in his official  
capacity as Director of National Intelligence,

*Defendants-Appellants.*

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Appeal from the United States District Court  
for the District of Maryland, Greenbelt Division  
Civil Action No. TDC-17-0361  
The Hon. Theodore D. Chuang, Presiding

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**CONSENT MOTION FOR LEAVE TO FILE BRIEF OF THE AMERICAN  
JEWISH COMMITTEE AS *AMICUS CURIAE*  
IN SUPPORT OF PLAINTIFFS-APPELLEES  
AND URGING AFFIRMANCE**

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April 19, 2017

*Counsel for Amicus Curiae*  
*The American Jewish Committee*

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**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rules of Appellate Procedure 26.1 and 27, and Fourth Circuit Local Rules 26.1 and 27, the American Jewish Committee (“AJC”), as *Amicus Curiae*, makes the following disclosures: (1) AJC is a non-profit organization; (2) AJC is not a publicly held corporation or other publicly held entity; (3) AJC does not have any parent corporations; (4) no publicly held corporation or other publicly held entity owns any portion of AJC; (5) AJC is not aware of any publicly held corporation or other publicly held entity that has a direct financial interest in the outcome of this litigation; and (6) this case does not arise out of a bankruptcy proceeding.

Dated: Washington, D.C.  
April 19, 2017

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## **I. INTRODUCTION**

Pursuant to Rule 29 of the Federal Rules of Appellate Procedure, the American Jewish Committee (“AJC”) respectfully moves for the Court’s leave to file the accompanying proposed 4,498-word *amicus* brief in support of Plaintiffs-Appellees and in favor of affirmance of the lower court. All parties have consented the filing of this brief.

## **II. IDENTITY AND INTEREST OF THE *AMICUS CURIAE***

For over 100 years, AJC has served to protect the civil and religious rights of American Jews. AJC has roughly 170,000 members and supporters and maintains 26 regional offices in major cities nationwide. For centuries, Jews have faced widespread persecution; they have been immigrants and refugees from tyranny, and have faced resistance to their resettlement. Including in connection with Jewish pogroms in Russia, AJC has lobbied persistently against national origin quotas and in favor of flexible rules when needed to accommodate emergency needs of refugees. AJC believes that the rights of Jews and others will be secure only when the rights of Americans of all faiths and nationalities are equally secure. As Rev. Dr. Martin Luther King, Jr., said to AJC leaders over 45 years ago: “Jews cannot ensure equality for themselves until and unless it is ensured for all.”

Today, AJC advocates for issues important to Jews around the world, including defending an inclusive America that provides safe haven for refugees fleeing persecution. AJC therefore promotes fair and just immigration policies for people of all races, religions, and national origins—consistent with its position that a strong, united America is vital for global freedom and security. Over the years, AJC has worked with a variety of stakeholders, including Latino leaders, religious and community leaders, entrepreneurs, and students, to promote comprehensive immigration reform. Further, AJC has consistently advocated against actions based on prejudice or that are otherwise inconsistent with these values. To this end, AJC has participated as *amicus curiae* in numerous cases throughout the last century, including its most recent brief against Indiana’s attempt to withhold federal funds for Syrian refugee resettlement in *Exodus Refugee Immigration, Inc. v. Pence*, 838 F.3d 902 (7th Cir. 2016).

### **III. REASONS WHY THE MOTION SHOULD BE GRANTED**

Given its understanding of and advocacy related to U.S. immigration and refugee policies, AJC offers the Court a unique perspective on the interests involved in this case. Its brief will shed much-needed light on the historical significance of executive action in affirmatively providing for refugee admissions and on the legality of the executive order at issue in this case.

#### IV. CONCLUSION

For these reasons, the Court should grant the request for leave to file the proposed *amicus* brief and direct the Clerk to accept the accompanying brief for filing.

Dated: Washington, D.C.  
April 19, 2017

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Respectfully submitted,

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## CERTIFICATE OF COMPLIANCE

Pursuant to Rules 27 and 32 of the Federal Rules of Appellate Procedure and the Local Rules, I certify that the foregoing motion complies with the type-volume limitation and the requirements for typeface, type-style, and formatting. This motion contains 445 words, excluding the items exempt from the word count limit under Federal Rule of Appellate Procedure 32(f), and was prepared in a proportionally spaced typeface using Microsoft Word 14-point Times New Roman font.

Dated: Washington, D.C.  
April 19, 2017

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**CERTIFICATE OF SERVICE**

I certify that on April 19, 2017, the foregoing motion and accompanying proposed brief were filed using the Court's CM/ECF system. All participants in the case that are registered users will be served electronically via that system. Service on parties not registered through CM/ECF will be made via Overnight Courier (Federal Express) at the address listed below:

Victor Williams  
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Dated: Washington, D.C.  
April 19, 2017

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