



April 23, 2025

**VIA ECF**

Honorable Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

Re: *American Association of University Professors, et al.*  
*v. United States Department of Justice, et al.*, Case No. 1:25-cv-02429-MKV

Dear Judge Vyskocil:

Proposed *amicus curiae* Foundation for Individual Rights and Expression (FIRE) respectfully files this unopposed motion for leave to file the accompanying brief in support of Plaintiffs in the above-referenced case.

“A district court has broad discretion to grant or deny an appearance as *amicus curiae* in a given case.” *Anderson v. Leavitt*, No. 03-cv-6115, 2007 WL 2343672, at \*2 (E.D.N.Y. Aug 13, 2007) (citing *Citizens Against Casino Gambling in Erie County v. Kempthorne*, 471 F. Supp. 2d 295, 311 (W.D.N.Y. 2007)). Furthermore, “[a]n *amicus* brief should normally be allowed when ... the *amicus* has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *C & A Carbone, Inc. v. Cnty. of Rockland*, No. 08-cv-6459-ER, 2014 WL 1202699, at \*3–4 (S.D.N.Y. Mar. 24, 2014) (quoting *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1063 (7th Cir. 1997)).

As detailed in the accompanying brief, FIRE has a unique perspective on and direct interest in this case. FIRE’s longstanding commitment to defending the individual rights of students and faculty to freedom of expression, freedom of association, academic freedom, and due process of law on our nation’s campuses informs the analysis it offers this Court. Having advocated against censorship at Columbia for more than twenty years, FIRE knows the institution’s protection of free

speech and academic freedom has been inconsistent and insufficient. But FIRE has fought against top-down federal efforts to silence protected speech on campus for just as long.

For the foregoing reasons, proposed *amicus* FIRE respectfully requests permission to file its brief, which is attached hereto as: Brief of *Amicus Curiae* Foundation for Individual Rights and Expression in Support of Plaintiffs.

Respectfully submitted,

/s/ Ronald G. London  
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