

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION of
UNIVERSITY PROFESSORS and
AMERICAN FEDERATION of
TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT of
JUSTICE et al.,

Defendants.

Case No. 1:25-cv-02429-MKV

**NOTICE OF UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF OF AMICI
CURIAE CENTER FOR CONSTITUTIONAL RIGHTS AND PALESTINE LEGAL**

Please take notice that the Center for Constitutional Rights and Palestine Legal respectfully move this Court for leave to file the accompanying Brief of Amici Curiae in support of Plaintiffs' Motion for a Preliminary Injunction. The Parties do not oppose this Motion. No party or party's counsel authored the proposed Brief of Amici Curiae, and no party or party's counsel contributed money to fund preparation or submission of the brief.

Amicus Center for Constitutional Rights is a non-profit legal advocacy organization dedicated to advancing the rights guaranteed by the United States Constitution and international law. The Center for Constitutional Rights has long worked with and sought to protect the rights of oppressed communities seeking justice and liberation, and has represented numerous individuals and organizations facing repression because of their advocacy for Palestinian rights.

Amicus Palestine Legal, a project of Tides Center, is a legal organization dedicated to protecting the civil and constitutional rights of people in the U.S. who speak out for Palestinian freedom. Palestine Legal tracks incidents of censorship and efforts to suppress expression

supporting Palestinian rights, including through the misuse of Title VI of the Civil Rights Act of 1964 to censor speech critical of Israel’s treatment of Palestinians.

ARGUMENT

Amici Center for Constitutional Rights and Palestine Legal, organizations with vast experience protecting the constitutional rights of people in the United States who speak out for Palestinian freedom, have “unique information or perspective that can help the court.” *Sec. & Exch. Comm’n v. Ripple Labs, Inc.*, No. 20-cv-10832 (AT), 2021 WL 4555352, at *5 (S.D.N.Y. Oct. 4, 2021) (internal quotation omitted); *see also Auto. Club of N.Y. v. Port Auth. of N.Y. & N.J.*, No. 11-cv-6746 (RJH), 2011 WL 5865296, at *2 (S.D.N.Y. Nov. 22, 2011) (internal quotation omitted) (“An *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.”).

“The primary role of the *amicus* is to assist the Court in reaching the right decision in a case affected with the interest of the general public.” *Russell v. Bd. of Plumbing Exam’rs*, 74 F. Supp. 2d 349, 351 (S.D.N.Y. 1999), *aff’d*, 1 F. App’x 38 (2d Cir. 2001). This Court has “broad discretion in deciding whether to accept an *amicus* brief.” *City of New York v. United States*, 971 F. Supp. 789, 791 n.3 (S.D.N.Y. 1997), *aff’d*, 179 F.3d 29 (2d Cir. 1999). Amici submit the proposed Brief of Amici Curiae to assist the Court with understanding the critical public interest issues before it and in reaching the right decision.

CONCLUSION

For the reasons stated above, Amici respectfully request that the Court grant leave to file the accompanying proposed Brief of Amici Curiae.

Dated: April 29, 2025

Respectfully submitted,

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** Pro hac vice application pending*

*Counsel for Amici Curiae Center for
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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2025, I electronically filed the foregoing document with the Clerk of Court via CM/ECF.

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