

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

PARS EQUALITY CENTER, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, President of the  
United States, *et al.*,

Defendants.

Docket No. 17-cv-00255 (TSC)

Electronically Filed

Hon. Tanya S. Chutkan

**MOTION FOR LEAVE TO FILE BRIEF OF HUMAN RIGHTS FIRST,  
KIND (KIDS IN NEED OF DEFENSE), AND TAHIRIH JUSTICE  
CENTER AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

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*\*Pro hac vice application pending*

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Human Rights First, KIND (Kids in Need of Defense), and Tahirih Justice Center (collectively, “*amici*”), through their undersigned counsel, respectfully move, pursuant to Rule 7 of the Federal Rules of Civil Procedure and Local Rule 7(o), for leave to file the accompanying *amicus curiae* brief in support of Plaintiffs’ Motion for Preliminary Injunction. Plaintiffs have consented to the filing of this brief, while Defendants have taken no position. *Amici* state as follows:

1. Human Rights First (formerly known as the Lawyers Committee for Human Rights) has worked since 1978 to promote fundamental human rights and to ensure protection of refugees’ rights, including the right to seek and enjoy asylum. Human Rights First grounds its refugee protection work in the standards set forth in the 1951 Convention Relating to the Status of Refugees (the “Refugee Convention”), the 1967 Protocol Relating to the Status of Refugees (the “1967 Protocol”), the Convention Against Torture and Other Cruel, Inhuman and Degrading Treatment or Punishment, and other international human rights instruments, and advocates adherence to these standards in the policies, practices, and laws of the United States government. Human Rights First also operates one of the largest *pro bono* asylum representation programs in the country, providing legal representation without charge to hundreds of indigent asylum applicants each year. Human Rights First is committed to ensuring that all protections granted under the 1951 Refugee Convention and the 1967 Protocol remain available to refugees and asylum seekers in the United States.

2. Kids in Need of Defense (KIND) is a national non-profit organization that works to ensure that no child faces immigration court alone. KIND provides direct representation, as well as working in partnership with law firms, corporate legal departments, law schools, and bar

associations that provide *pro bono* representation, to unaccompanied children in their removal proceedings. KIND advocates for changes in law, policy, and practices to improve the protection of unaccompanied children in the United States. KIND staff and KIND *pro bono* attorneys seek to ensure that every child in removal proceedings receives the full measure of due process protections that the law affords. Accordingly, KIND respectfully joins this amicus brief, in the interest of improving consistency and even-handedness in the treatment of unaccompanied children who come before our immigration courts.

3. Tahirih Justice Center (“Tahirih”) is a national non-profit that has served courageous individuals fleeing violence since 1997. Through direct services, policy advocacy, and training and education, Tahirih protects immigrant women and girls and promotes a world where women and girls enjoy equality and live in safety and dignity. In four offices nationwide, Tahirih serves immigrant women and girls who have rejected violence and who seek safety for themselves and their children, but who face serious obstacles to justice, including language barriers, lack of resources, and a complex immigration system.

4. *Amici* are concerned about the real-life implications of the Executive Order issued on March 6, 2017, entitled “Protecting the Nation from Foreign Terrorist Entry into the United States” (the “Executive Order”). *Amici* are fundamentally concerned with the interference in familial relations that will result from enforcement of the Executive Order, as well as its limitations on immigration, non-immigrant travel, and refugee resettlement.

5. This Court has “broad discretion” to grant leave to appear as *amicus curiae* if the information offered is timely and useful. *Ellsworth Assocs., Inc. v. United States*, 917 F. Supp. 841, 846 (D.D.C. 1996) (granting motion to file an *amicus curiae* brief where movants “have a special interest in [the] litigation as well as a familiarity and knowledge of the issues raised

therein that could aid in the resolution” of those issues). *Amici* are non-profit organizations that, among other things, provide legal assistance and other forms of support to immigrant communities and refugees, advocate in favor of immigrant and refugee rights, educate the public and policymakers about the enduring contributions of America’s immigrants, and promote justice and equality of treatment in various areas of immigration and refugee law. All *amici* have a direct interest in the outcome of this case, and *amici* respectfully submit that leave to file the attached brief is appropriate.

6. The proposed *amicus* brief, attached as an exhibit hereto, explains why the Executive Order is reviewable by this Court, and how the Executive Order would irreparably harm affected individuals and their families if implemented.

**Local Rule 7(m) Statement**

Undersigned counsel, by email, have determined that counsel for Plaintiffs consent to the filing of this motion, while counsel for Defendants have taken no position.

**Conclusion**

*Amici* respectfully request that this Court grant them leave to file the *amicus curiae* brief attached hereto.

Dated: April 3, 2017

Respectfully submitted,

By: /s/ Andrew M. Lacy

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*\*Pro hac vice application pending*

*Counsel for Amici Curiae Human Rights  
First, KIND (Kids in Need of Defense), and  
Tahirih Justice Center*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 3, 2017, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the District's CM/ECF system.

I hereby certify that on April 3, 2017, the foregoing document was served on all parties or their counsel of record through the CM/ECF system.

/s/ Andrew M. Lacy  
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