

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

STATE OF TENNESSEE, et al.)	
)	
Plaintiffs,)	No. 1:17-cv-01040-STA-egb
)	
v.)	
)	
U.S. DEPARTMENT OF STATE, et al.,)	
)	
Defendants,)	
)	
v.)	
)	
TENNESSEE IMMIGRANT AND REFUGEE RIGHTS COALITION, on behalf of itself and its members, BRIDGE REFUGEE SERVICES, INC., and NASHVILLE INTERNATIONAL CENTER FOR EMPOWERMENT,)	
)	
Intervenor-Defendants.)	
)	

INTERVENOR-DEFENDANTS’ MOTION TO INTERVENE

Intervenor-Defendants Tennessee Immigrant and Refugee Rights Coalition, on behalf of itself and its members, Bridge Refugee Services Inc., and Nashville International Center for Empowerment, by and through their counsel of record, hereby move to intervene as defendants pursuant to Federal Rule of Civil Procedure 24(a) and (b). This motion is supported by the memorandum of facts and law also filed on this date.

Dated: June 2, 2017

Respectfully submitted,

/s/ Thomas H. Castelli _____
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*Application for admission *pro hac vice* forthcoming

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), I certify as follows: Cody Wofsy, an attorney representing the Intervenor-Defendants, emailed Defendants' counsel, James Jordan Gilligan and Stuart Justin Robinson, at 12:05 p.m. CDT on May 31, 2017, proposing to confer by phone on June 1, 2017, at 1:00 p.m. Defendants' counsel responded that they were unavailable at that time because of the deadline to file Defendants' motion to dismiss, and counsel for Intervenor-Defendants and Defendants agreed to confer by phone on June 2, 2017. After consultation at that time, Defendants' counsel informed Intervenor-Defendants' counsel that Defendants are not able to take a position on the instant motion at this time.

Mr. Wofsy also emailed Plaintiffs' counsel, Brennan Tyler Brooks, Richard Thompson, and Kate Margaret Oliveri, at 12:05 p.m. CDT on May 31, 2017, proposing to confer by phone on June 1, 2017, at 12:00 p.m. CDT; or, if that time was inconvenient, at another time on May 31 or June 1. Intervenor-Defendants' counsel offered in subsequent emails to confer any time May 31, June 1, or the morning of June 2, or to confer by email. Plaintiffs' counsel informed Intervenor-Defendants' counsel that they were unavailable to confer by phone at any time before June 5 and did not respond to the offer to confer by email. Intervenor-Defendants' counsel advised Plaintiffs' counsel on June 1 at 11:02 a.m. CDT that they would file the instant motion today in the interests of timeliness, but agreed to consult with Plaintiffs' counsel on June 5 at 11:00 a.m. CDT and relay the outcome of that consultation to the Court. Intervenor-Defendants' counsel has not yet received a response to that email.

/s/ Thomas H. Castelli
Thomas H. Castelli

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2017, a true and correct copy of the foregoing document has been served via ECF to:

Counsel for Plaintiffs:

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/s/ Thomas H. Castelli
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