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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

JOHN DOE #1; JUAN RAMON MORALES;  
JANE DOE #2; JANE DOE #3; IRIS  
ANGELINA CASTRO; BLAKE DOE;  
BRENDA VILLARRUEL; and LATINO  
NETWORK,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; KEVIN MCALEENAN, in his  
official capacity as Acting Secretary of the  
Department of Homeland Security; U.S.  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; ALEX M. AZAR II, in  
his official capacity as Secretary of the  
Department of Health and Human Services;  
U.S. DEPARTMENT OF STATE;  
MICHAEL POMPEO, in his official capacity  
as Secretary of State; and UNITED STATES  
OF AMERICA,

Defendants.

Case No.: 3:19-cv-01743-SB

**MOTION FOR LEAVE TO FILE BRIEF  
OF AMICI CURIAE OREGON  
IMMIGRANT RIGHTS  
ORGANIZATIONS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION**

Amici organizations Causa, El Programa Hispano Católico, Virginia Garcia Memorial Health Center, Adelante Mujeres, Oregon Interfaith Movement for Immigrant Justice, Centro Latino Americano, Catholic Charities Immigration Legal Services, Immigrant and Refugee Community Organization, VIVA Inclusive Migrant Network, respectfully move for leave to file an amici curiae brief in the above-captioned matter. Plaintiffs John Does #1, et al. support this request.

“The district court has broad discretion to appoint amici curiae.” *Hoptowit v. Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982), overruled on other grounds by *Sandin v. Conner*, 515 U.S. 472, (1995). The “classic role of amicus curiae” is “assisting in a case of general public interest, supplementing the efforts of counsel, and drawing the court’s attention to law that escaped consideration.” *Miller-Wohl Co. v. Comm’r of Labor & Indus. State of Mont.*, 694 F.2d 203, 204 (9th Cir. 1982). Leave to file a supporting amici curiae brief is appropriate based on the interest of the ACLU of Oregon and its clients.

### **Statement of Interest**

Amici are organizations in Oregon who collectively work together in the Oregon Ready coalition or work in collaboration with that coalition. Amici work to further statewide inclusion and create a stronger immigrant rights infrastructure in Oregon by combining community-based organizing, immigrant defense work, immigrant rights policy development, and public discourse. The issues raised in this case are of profound importance to the organizational missions of amici, and they have a unique perspective on immigration, immigrant rights, and the Oregon immigrant experience that may be helpful to the court in resolving the matter. As organizations that serve Oregon’s immigrant communities and, in many cases, are themselves made up of immigrant staff and membership, amici have felt and observed the impact of this cumulative assault on

immigrants, and are uniquely positioned to inform the court of the devastating consequences the President's October 4, 2019 Proclamation would have.

Causa works to improve the lives of Latino immigrants and their families in Oregon through advocacy, coalition building, leadership development, and civic engagement. Latino immigrants and their families are the heart of Causa and inspire, implement, and champion Causa's work.

El Programa Hispano Católico's mission is to advance racial equity and social justice through the power of Latinx culture, community and self-determination.

Virginia Garcia Memorial Health Center's mission is to provide high quality, comprehensive, and culturally appropriate primary health care to the communities of Washington and Yamhill counties, with a special emphasis on migrant and seasonal farmworkers and others with barriers to receiving health care.

Adelante Mujeres provides holistic education and empowerment opportunities to marginalized Latina women and families to ensure full participation and active leadership in the community.

Oregon Interfaith Movement for Immigrant Justice (IMIrJ) accompanies and equips communities and people of faith to advance immigrant justice through direct accompaniment of immigrants facing detention and deportation, policy advocacy at local, state and national levels, and prophetic action. IMIrJ is an organization made up diverse faith communities, faith leaders, and individuals called by their conscience to respond actively and publicly to the suffering of immigrant brothers and sisters in the United States due to unjust immigration policies.

Centro Latino Americano works to empower Latino families of Lane County by providing opportunities and building bridges for a stronger community. Centro Latino

Americano's vision is a thriving, connected community where all people are valued.

Catholic Charities Immigration Legal Services is a nonprofit law program providing low-cost consultations and legal representation to immigrants and refugees throughout Oregon and southwest Washington. Catholic Charities educates the public, immigrant communities, and the organizations who serve them to promote justice for all newcomers and support conditions for their full participation in American society. Catholic Charities provides legal representation supporting family reunification and assistance to the most vulnerable immigrants and refugees, including survivors of domestic violence, sexual assault, and human trafficking.

The Immigrant and Refugee Community Organization (IRCO) serves the holistic needs of immigrants, refugees, and mainstream community members in Oregon and southwest Washington. IRCO's mission is to promote the integration of refugees, immigrants, and the community at large into a self-sufficient, healthy and inclusive multi-ethnic society. As a community-based organization, IRCO provides more than 200 culturally and linguistically specific social services. IRCO's vision is to be a leader of community driven, innovative programs delivered by compassionate staff who create equitable services that empower immigrants, refugees, and underserved communities.

VIVA Inclusive Migrant Network is a nonprofit organization that supports migrant communities in Oregon. VIVA Inclusive Migrant Network's mission is to empower their community, educate, create immigrant right awareness and take actions against inhumane immigration policies.

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The amici organizations respectfully requests this Court grant leave to file a brief of amici curiae in support of Plaintiff's Motion for Preliminary Injunction.

DATED this 12th day of November, 2019.

By: s/ Leland Baxter-Neal  
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