

No. 19-2222

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

CASA DE MARYLAND, INC.; ANGEL AGUILUZ; MONICA CAMACHO PEREZ,
Plaintiff-Appellees,

v.

DONALD J. TRUMP, in his official capacity as President of the United States;
CHAD WOLF, in his official capacity as Acting Secretary of Homeland Security;
U.S. DEPARTMENT OF HOMELAND SECURITY; KENNETH T. CUCCINELLI, II, in his
official capacity as Acting Director, U.S. Citizenship and Immigration Services;
U.S. CITIZENSHIP AND IMMIGRATION SERVICES,
Defendant-Appellants.

On Appeal from the United States District Court for the District of Maryland,
Case No. 8:19-cv-02715-PWG, Judge Paul W. Grimm

**CONSENT MOTION OF AMICI CURIAE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF COLORED PEOPLE, PUBLIC CITIZEN,
NATIONAL FAIR HOUSING ALLIANCE, HOUSING OPPORTUNITIES
MADE EQUAL OF VIRGINIA, PUBLIC INTEREST LAW CENTER,
CHICAGO LAWYERS' COMMITTEE FOR CIVIL RIGHTS, LAWYERS
FOR CIVIL RIGHTS, LAWYERS' COMMITTEE FOR CIVIL RIGHTS
OF THE SAN FRANCISCO BAY AREA, PUBLIC COUNSEL, THE
WASHINGTON LAWYERS' COMMITTEE FOR CIVIL RIGHTS AND
URBAN AFFAIRS, AND PEOPLE FOR THE ETHICAL TREATMENT OF
ANIMALS, INC.**

ERIC L. HAWKINS
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6000

PAUL R. Q. WOLFSON
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 663-6000

Counsel for Amicus Curiae NAACP

December 16, 2020

ADDITIONAL COUNSEL AND REPRESENTATION INFORMATION ON SIGNATURE PAGE

Pursuant to Fed. R. App. P. 27 and 29, *Amici Curiae* National Association for the Advancement of Colored People, Public Citizen, National Fair Housing Alliance, Housing Opportunities Made Equal of Virginia, Public Interest Law Center, Chicago Lawyers' Committee for Civil Rights, Lawyers for Civil Rights, Lawyers' Committee for Civil Rights of the San Francisco Bay Area, Public Counsel, the Washington Lawyers' Committee for Civil Rights and Urban Affairs, and People for the Ethical Treatment of Animals, Inc. (collectively, "*Amici In Support Of En Banc Review*" or "*Amici*") respectfully request that their respective *amicus* briefs in support of *en banc* review be considered by the full court in its consideration of this case on the merits, and state as follows:

1. *Amici In Support of En Banc Review* filed *amicus* briefs in support of Plaintiff-Appellees' Petition for Rehearing and Rehearing *En Banc*, Dkt. No. 115. *See* Dkt. Nos. 118, 119, 122, 124, 127.

2. Each brief filed by *Amici* was accepted for filing by the Court. Order, Dkt. 149 ("All *amicus curiae* briefs relating to the petition for rehearing and for rehearing *en banc* were accepted for filing by the court.").

3. The Court granted rehearing *en banc* on December 3, 2020, and ordered the parties and "any *amici*" to file 16 paper copies of their briefs. Order, Dkt. 147. The Court later clarified that *Amici In Support of En Banc Review* need not submit paper copies of their briefs. Dkt. 149.

4. The briefs filed by *Amici* directly pertain to important issues under consideration by the full court, including without limitation the doctrine of organizational standing and the propriety of nationwide injunctions. *Amici* respectfully submit that their briefs in support of *en banc* review will assist the full court's analysis of this appeal on the merits. *Amici* do not presently request leave to file additional briefs, and no party will be prejudiced by the relief sought by this motion.

5. Pursuant to Local Rule 27(a), *Amici* state that all parties to the appeal have been informed of this motion and have no objection to the relief sought herein.

WHEREFORE, for the foregoing reasons, *Amici In Support of En Banc Review* request that their briefs already accepted for filing by the Court, Dkt. Nos. 118, 119, 122, 124, 127, be considered by the full court on the merits.

Respectfully submitted,

/s/ Paul R. Q. Wolfson

PAUL R. Q. WOLFSON
WILMER CUTLER PICKERING

HALE AND DORR LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 663-6000

ERIC L. HAWKINS
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6000

Counsel for Amicus Curiae NAACP

ALLISON M. ZIEVE
SCOTT L. NELSON
NANDAN M. JOSHI
PUBLIC CITIZEN LITIGATION GROUP
1600 20th Street, NW
Washington, DC 20009
(202) 588-7733

*Counsel for Amicus Curiae
Public Citizen*

LILA REBECCA MILLER
SASHA MINH SAMBERG-CHAMPION
TARA KOLAR RAMCHANDANI
RELMAN COLFAX PLLC
1225 19th Street, NW
Washington, DC 20036
(202) 728-1888

*Counsel for Amicus Curiae
National Fair Housing Alliance and
Housing Opportunities Made Equal
of Virginia*

WILLIAM ALDEN MCDANIEL, JR.
BALLARD SPAHR, LLP
18th Floor
300 East Lombard Street
Baltimore, MD 21202-3268
410-528-5502

STEPHEN J. KASTENBERG
THOMAS W. HAZLETT
JULIANA B. CARTER
SPENCER HILL
MICHAEL J.M. FAUSEY
BALLARD SPAHR, LLP
1735 Market Street
Philadelphia, PA 19103-7599
(215) 864-8122

*Counsel for Amicus Curiae Public Interest Law Center, Chicago Lawyers'
Committee for Civil Rights, Lawyers for Civil Rights, Lawyers' Committee for
Civil Rights of the San Francisco Bay Area, Public Counsel, and The Washington
Lawyers' Committee for Civil Rights and Urban Affairs*

ADAM BEN ABELSON
ZUCKERMAN SPAEDER, LLP
Suite 2440
100 East Pratt Street
Baltimore, MD 21202-0000
(410) 332-0444

MARCOS E. HASBUN
ZUCKERMAN SPAEDER, LLP
Suite 1200
101 East Kennedy Blvd.
Tampa, FL 33602-5838
(813) 221-1010

CAITLIN K. HAWKS
ZEYNEP J. GRAVES
PETA FOUNDATION
2154 West Sunset Blvd.
Los Angeles, CA 90026
(323) 210-2263

Counsel for Amicus Curiae People for the Ethical Treatment of Animals Inc.

December 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing with the Clerk of the United States Court of Appeals for the Fourth Circuit via the CM/ECF system this 16th day of December, 2020, and served on all counsel of record via the CM/ECF system.

/s/ Paul R. Q. Wolfson

PAUL R. Q. WOLFSON

WILMER CUTLER PICKERING

HALE AND DORR LLP

1875 Pennsylvania Avenue, NW

Washington, DC 20006

(202) 663-6000

December 16, 2020