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February 1, 2017

VIA ECF

The Honorable Carol Bagley Amon
Senior Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Darweesh et al. v. Trump et al.*, Case No. 17-cv-00480-CBA

Dear Judge Amon:

This law firm represents the Anti-Defamation League (“ADL”). We write to seek the Court’s permission to file an *amicus* brief in the above-referenced case. In the alternative, pursuant to Rule 3(A) of this Court’s Individual Rules, we request a pre-motion conference to authorize leave to file such a brief.

Founded in 1913, ADL is a civil rights and human relations organization that seeks to stop the defamation of the Jewish people, and secure justice and fair treatment for all. Through its 26 regional offices in the U.S., and its international office in Israel, ADL provides materials, programs and services to combat anti-Semitism and all forms of bigotry. Because of its long history of fighting prejudice and discrimination, including with respect to immigrants and religious minorities, ADL can provide unique and important insights for the court in addressing the Plaintiffs’ Complaint and the January 27, 2017 Executive Order focused on temporarily barring all refugees and limiting or barring entry from persons coming from seven majority-Muslim countries.

“District courts have broad discretion in deciding whether to accept amicus briefs.” *In re HSBC Bank, USA, N.A., Debit Card Overdraft Fee Litig.*, 14 F. Supp. 3d 99, 103 (E.D.N.Y. 2014) (citation 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.” *Citizens Against Casino Gambling in Erie County v. Kempthorne*, 471 F. Supp. 2d 295, 311 (W.D.N.Y. 2007) (citation omitted).

Hon. Carol Bagley Amon

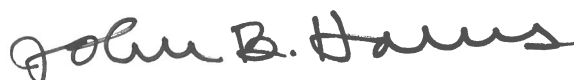
February 1, 2017

Page 2 of 2

ADL is acutely familiar with the consequences of policies that refuse immigration avenues for refugees of a select religious group. Our *amicus* brief would focus on this nation's history of dealing with refugees, and how that history may affect a ruling regarding whether the Executive Order should be enjoined.

For the foregoing reasons, we respectfully request the court's permission to file an *amicus* brief on or before a date to be set by the court. In the alternative, we request a pre-motion conference with the court for leave to file such a brief.

Respectfully submitted,

A handwritten signature in black ink that reads "John B. Harris". The signature is written in a cursive style with a large initial "J" and a distinct "H".

John B. Harris

cc: All Counsel of Record (via ECF)