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10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 Pedro VASQUEZ PERDOMO; Carlos
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15 VILLEGAS MOLINA; Jorge
HERNANDEZ VIRAMONTES; Jason
16 Brian GAVIDIA; LOS ANGELES
WORKER CENTER NETWORK;
17 UNITED FARM WORKERS;
COALITION FOR HUMANE
18 IMMIGRANT RIGHTS; IMMIGRANT
DEFENDERS LAW CENTER,

19 Plaintiffs,

20 v.
21

22 KRISTI NOEM, in her official capacity
as Secretary of the Department of
Homeland Security; Todd M. LYONS,
23 in his official capacity as Acting
Director, U.S. Immigrations and
24 Customs Enforcement; Rodney S.
SCOTT, in his official capacity as
25 Commissioner, U.S. Customs and
Border Patrol; Michael W. BANKS, in
26 his official capacity as Chief of U.S.
Border Patrol; Kash PATEL, in his
27 official capacity as Director, Federal
Bureau of Investigation; Pam BONDI,
28 in her official capacity as U.S. Attorney

Case No.: 2:25-cv-05605-MEMF-SP

**UNOPPOSED MOTION FOR
LEAVE TO FILE BRIEF OF
AMICI CURIAE IN SUPPORT OF
STOP/ARREST PLAINTIFFS'
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER [ECF 45]**

Judge: Maame Ewusi-Mensah
Frimpong

1 General; Ernesto SANTACRUZ JR., in
2 his official capacity as Acting Field
3 Office Director for Los Angeles, U.S.
4 Immigration and Customs Enforcement;
5 Eddy WANG, Special Agent in Charge
6 for Los Angeles, Homeland Security
7 Investigations, U.S. Immigration and
8 Customs Enforcement; Gregory K.
9 BOVINO, in his official capacity as
10 Chief Patrol Agent for El Centro Sector
11 of the U.S. Border Patrol; Jeffrey D.
12 STALNAKER, in his official capacity
as Acting Chief Patrol Agent, San Diego
Sector of the U.S. Border Patrol; Akil
DAVIS, in his official capacity as
Assistant Director in Charge, Los
Angeles Office, Federal Bureau of
Investigation; Bilal A. ESSAYLI, in his
official capacity as U.S. Attorney for the
Central District of California,

Defendants.

13 The State of California, together with the States of Arizona, Colorado,
14 Connecticut, Hawai'i, Illinois, Maryland, Maine, Michigan, Minnesota, Nevada,
15 New Jersey, New Mexico, New York, Oregon, Vermont, Washington, and the
16 Commonwealth of Massachusetts ("Amici States"), respectfully move for leave to
17 appear as amici curiae and file the proposed amici curiae brief, attached hereto as
18 Exhibit 1, in support of Stop/Arrest Plaintiffs' Application for a Temporary
19 Restraining Order [ECF 45]. Plaintiffs and defendants have indicated they do not
20 oppose this request. Defendants also indicated they "will contend that such
21 additional filing and briefing further demonstrates why this complex and fact bound
22 matter must be heard and decided on a ***proper*** motion basis."

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24 **I. STANDARD FOR MOTION FOR LEAVE TO APPEAR AS AMICI CURIAE**

25 District courts may consider amicus briefs from non-parties with unique
26 information or perspectives that are useful or otherwise desirable to the court. *See*
27 *WildEarth Guardians v. Haaland*, 561 F. Supp. 3d 890, 906 (C.D. Cal. 2021).
28 While there are no strict prerequisites to qualify for amicus status, district courts

1 “have granted amicus status when the amicus has unique information or perspective
2 that can help the court beyond the help that the lawyers for the parties are able to
3 provide.” *Stross v. Glass Homes, Inc.*, 2022 WL 21310031, at *1 (C.D. Cal. Apr. 4,
4 2022) (internal quotation marks and citation omitted). Participation of amicus
5 curiae may also be appropriate where the legal issues have potential ramifications
6 beyond the parties directly involved. *Id.*

7 **II. INTEREST AND IDENTITY OF AMICI CURIAE**

8 The proposed amicus brief provides a unique perspective to the Court about
9 the harms that will befall the States if defendants’ unconstitutional enforcement
10 practices continue. As set forth in the proposed brief, California and its
11 communities have already suffered serious harms due to defendants’ practices in
12 Los Angeles. However, the raids are not likely to stop in Los Angeles. President
13 Donald Trump promised before taking office to institute the largest deportation
14 program in U.S. history.¹ And in the midst of the raids in Los Angeles, he declared
15 that “we must expand efforts to detain and deport Illegal Aliens in America’s
16 largest Cities, such as Los Angeles, Chicago, and New York, where Millions upon
17 Millions of Illegal Aliens reside. These, and other such Cities, are the core of the
18 Democrat Power Center”² Thus, although this lawsuit arises from actions that
19 have occurred in Los Angeles, all Amici States have an interest in protecting their
20 communities from the harmful and unlawful tactics at issue.

21 Immigrants are integral to the social fabric of Amici States. Amici States are
22 home to millions of immigrants, who bring diverse cultures, languages, and
23 perspectives that enrich and strengthen our communities.³ Defendants’

24 ¹ Steve Inskeep & Christopher Thomas, *Trump promised the 'largest deportation' in U.S.
25 history. Here's how he might start*, NPR (November 14, 2024),
[https://www.npr.org/2024/11/12/nx-s1-5181962/trump-promises-a-mass-deportation-on-day-1-
26 what-might-that-look-like](https://www.npr.org/2024/11/12/nx-s1-5181962/trump-promises-a-mass-deportation-on-day-1-what-might-that-look-like).

27 ² Donald J. Trump, Truth Social (Jun. 15, 2025),
<https://truthsocial.com/@realDonaldTrump/posts/114690267066155731>.

28 ³ See Charles Hirschman, *The Contributions of Immigrants to American Culture*, National
Library of Medicine (December 9, 2013),
<https://pmc.ncbi.nlm.nih.gov/articles/PMC3856769/#abstract1>.

1 suspicionless stops have already disrupted the local economy in Los Angeles
2 because many workers and customers are afraid to leave their homes. Their tactics
3 have also discouraged some residents from seeking medical treatment and have
4 chilled participation in countless other activities of daily life, including attendance
5 at schools and places of worship. Furthermore, the chilling effect of defendants'
6 conduct is not limited to undocumented immigrants, and has impacted those with
7 legal status, including citizens.

8 In addition to the harms felt by families, business owners, and countless
9 service providers, defendants' conduct has obstructed local law enforcement.
10 Defendants' tactics have caused widespread confusion, delays, and danger for both
11 local law enforcement and the community it protects. Indeed, masked ICE agents
12 have at times been mistaken for criminals, and local police have investigated
13 alleged crimes that were later determined to be federal immigration enforcement
14 operations. Copycat crimes by individuals impersonating ICE agents are also on the
15 rise.

16 As set forth in greater detail in the attached brief, Amici States have a critical
17 interest in ensuring that defendants cease enforcement practices that have harmed
18 communities, disrupted civil society, and shaken local economies.

19 **III. CONCLUSION**

20 For the foregoing reasons, the Amici States respectfully request this Court's
21 leave to appear as amici curiae and deem the proposed amicus brief filed.
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Respectfully submitted,

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14 *Admission pending

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