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**CITIES AND COUNTIES PROPOSED AMICUS BRIEF:  
SUPREME COURT APPEAL ON IMMIGRATION EXECUTIVE ACTION**

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New York City, Los Angeles, Atlanta, Birmingham and a coalition of local governments are preparing an amicus brief to the U.S. Supreme Court supporting the President's executive action on immigration. We expect the brief to be due in early March. This memo provides instructions for how your city, county, mayor, or county leader can sign on to the brief. It also includes specific requests for information from participating cities, counties, and local government leaders.

**Background:** On January 19, 2016, the Supreme Court agreed to review a preliminary injunction blocking the nationwide implementation of the President's executive action on immigration. The executive action provides important humanitarian relief to an estimated 4 million undocumented immigrants who have been in the country since January 2010 and who have children who are citizens or permanent residents or who came to the United States as children and meet certain educational requirements. The executive action prevents families from being split apart and harmed by allowing qualifying parents and young people who merit a favorable exercise of discretion to stay in the United States temporarily and work lawfully.

Cities and counties play a key role in explaining how our local residents, families, and communities are harmed by the preliminary injunction. Earlier in the case, a coalition of cities, counties, and local government leaders filed amicus briefs in the district court (over 30 signatories), the circuit court (over 70 signatories), and the Supreme Court at the certiorari stage (over 80 signatories). The cities of New York, Los Angeles, Atlanta, and Birmingham are again preparing an amicus brief supporting the executive action. It is crucial that the Supreme Court hear the voices of local governments as the Court prepares to review the injunction blocking the executive action.

**Focus of the brief:** The brief will provide a powerful counterpoint to the plaintiff states' claim of harm by outlining the immense local benefits of the

executive action: promoting family unity and child welfare; strengthening local communities and economies; and encouraging open communication and engagement between residents and local authorities.

On the standing question, the brief will also argue that plaintiff states failed to represent the interests of the cities and counties (and millions of residents of those cities and counties) that support the executive action, and that a nationwide injunction was unjustified.

Based on feedback from other cities and counties, additional points may be added.

**Timing:** The exact filing date has not been set, but we anticipate filing in early March. *Due to the compressed timeline, we encourage you to immediately engage your colleagues, including your city or county attorney, and take steps to obtain authorization to sign on to the brief as soon as possible.*

**Sign ons:** We will need written confirmation that your city, county, mayor, or county leader will sign on, as well as the signature block of the attorney representing them in their public capacity. The deadline for sign-ons will be set when we have a firm filing date, likely early March, but you should not delay in making arrangements to sign on. A sample signature block is below.

Sample signature block:

ZACHARY W. CARTER  
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(212) 356-2500  
*Attorney for the City of New York  
and Mayor Bill de Blasio*

**Requests for information:**

- Please contact us if your city or county is in one of the plaintiff states.<sup>1</sup> We would like to hear about your experience and, in particular, whether the state notified or solicited input from your city or county about the impact of the executive action or the state's participation in this lawsuit.

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<sup>1</sup> Texas, Alabama, Arizona, Arkansas, Florida, Georgia, Idaho, Indiana, Kansas, Louisiana, Maine, Michigan, Mississippi, Montana, Nebraska, Nevada, North Carolina, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Tennessee, Utah, West Virginia, or Wisconsin.

- Please contact us if your city or county has relevant experience from past deferred action programs, like those for refugees from Haiti and Central America; the late 1980s policy granting deferred action to spouses and children of people with legal status; or the 2012 Deferred Action for Childhood Arrivals (DACA) program.

**To join the amicus brief, share your city's or county's experience, or ask any questions, please contact one of the following individuals:**

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**For sign-ons, please copy:**

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For reference, the following officials, localities, and organizations signed on to the amicus brief filed with the Supreme Court in support of the federal government's petition for certiorari. Individuals and localities that previously joined the brief should notify the individuals above if they intend to sign on to the merits brief and confirm that the signature block remains the same.

- Mayor Bill de Blasio of New York City
- Mayor Eric Garcetti of Los Angeles, California
- Mayor Kasim Reed of Atlanta, Georgia
- Mayor Katherine M. Sheehan of Albany, New York
- Mayor William D. Euille and the City of Alexandria, Virginia
- The County Board of Arlington County, Virginia
- Mayor Steve Adler of Austin, Texas
- Mayor Stephanie Rawlings-Blake and the City Council of Baltimore

- The City of Bell, California
- Mayor William A. Bell, Sr. of Birmingham, Alabama
- Mayor David H. Bieter of Boise, Idaho
- Mayor Martin J. Walsh of Boston, Massachusetts
- Mayor Byron W. Brown of Buffalo, New York
- The City of Cambridge, Massachusetts
- Mayor James Diossa of Central Falls, Rhode Island
- Mayor Joseph P. Riley, Jr., of Charleston, South Carolina
- Mayor Rahm Emanuel of Chicago, Illinois
- Mayor Michael B. Coleman of Columbus, Ohio
- Cook County, Illinois
- Mayor Dan Wolk of Davis, California
- Mayor Nan Whaley and the City of Dayton, Ohio
- Mayor Michael B. Hancock of the City & County of Denver, Colorado
- The Village of Dolton, Illinois
- Mayor Richard H. Garcia and the City of Edinburg, Texas
- El Paso County, Texas
- Mayor Elizabeth Tisdahl of Evanston, Illinois
- Mayor Peter Lindstrom of Falcon Heights, Minnesota
- Mayor Karen Freeman-Wilson of Gary, Indiana
- Mayor Domenick Stampone of the Borough of Haledon, New Jersey
- Mayor Pedro Segarra of Hartford, Connecticut
- The Incorporated Village of Hempstead, New York
- Mayor Nancy R. Rotering of Highland Park, Illinois
- Mayor Dawn Zimmer and the City of Hoboken, New Jersey
- Mayor Alex B. Morse of Holyoke, Massachusetts
- Mayor Annise D. Parker of Houston, Texas
- Mayor Svante L. Myrick of Ithaca, New York
- Mayor Steven M. Fulop of Jersey City, New Jersey
- Mayor Sylvester “Sly” James of Kansas City, Missouri
- Mayor Mark Stodola of Little Rock, Arkansas
- Mayor Robert Garcia of Long Beach, California
- Los Angeles County, California
- Mayor Paul R. Soglin of Madison, Wisconsin
- Mayor Daniel T. Drew of Middletown, Connecticut
- The City of Milwaukee
- Mayor Betsy Hodges and the City of Minneapolis, Minnesota
- Montgomery County, Maryland
- Mayor Toni N. Harp of New Haven, Connecticut
- Mayor Noam Bramson and the City of New Rochelle, New York
- Mayor Ras J. Baraka of Newark, New Jersey
- Mayor Setti D. Warren of Newton, Massachusetts
- Mayor Paul A. Dyster of Niagara Falls, New York
- Mayor Libby Schaaf and the City of Oakland, California
- Mayor Jose “Joey” Torres of Paterson, New Jersey
- Mayor Michael A. Nutter of Philadelphia, Pennsylvania
- Mayor William Peduto of Pittsburgh, Pennsylvania
- Mayor Adrian O. Mapp of Plainfield, New Jersey
- Mayor Charlie Hales and the City Council of Portland, Oregon
- Prince George’s County, Maryland
- Princeton, New Jersey
- Mayor Jorge O. Elorza of Providence, Rhode Island
- Mayor Tom Butt and the City of Richmond, California

- Mayor Lovely Warren of Rochester, New York
  - Mayor Ralph Becker of Salt Lake City, Utah
  - Mayor Edwin M. Lee and the City and County of San Francisco
  - Mayor Sam Liccardo of San Jose, California
  - Mayor Miguel Pulido and the City of Santa Ana, California
  - The County of Santa Clara, California
  - The Board of Supervisors of Santa Cruz County, Arizona
  - Mayor Javier M. Gonzales and the City of Santa Fe, New Mexico
  - The City of Santa Monica, California
  - Mayor Gary R. McCarthy of Schenectady, New York
  - Mayor Edward B. Murray of Seattle, Washington
  - Mayor Joseph A. Curtatone of Somerville, Massachusetts
  - Sonoma County, California
  - Mayor Pete Buttigieg of South Bend, Indiana
  - Mayor Francis G. Slay of St. Louis, Missouri
  - Mayor Elizabeth A. Goreham and the State College Borough Council, Pennsylvania
  - Mayor Michael J. Ryan of Sunrise, Florida
  - Mayor Stephanie A. Miner of Syracuse, New York
  - Mayor Marilyn Strickland of Tacoma, Washington
  - Mayor Bob Buckhorn of Tampa, Florida
  - Mayor Muriel Bowser of Washington, D.C.
  - Mayor Lindsey P. Horvath of West Hollywood, California
  - Mayor Mike Spano of Yonkers, New York
  - The National League of Cities
  - The United States Conference of Mayors
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