

CASE NO. 17-35105

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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STATE OF WASHINGTON, *et al.*,  
Appellants

v.

DONALD J. TRUMP, PRESIDENT, *et al.*,  
Appellees

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ON APPEAL FROM THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON,  
CASE NO. 2:17-cv-00141-JLR.

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**MOTION FOR LEAVE TO FILE AMICUS BRIEF**

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February 7, 2017

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*Amicus Curiae* Freedom Watch, Inc. (“Freedom Watch”) hereby moves this Court for leave to file its Amicus brief, which was filed on February 6, 2017. Freedom Watch is a public interest group dedicated to preserving freedom, pursuing individual rights and civil liberties, preserving the rule of law and public confidence in the courts, and fighting for ethics in government and the judicial system, as well as investigating and prosecuting government corruption and abuse. As part of its goal to remain constant to the principles of the Founding Fathers, Freedom Watch is dedicated to ensuring the rights of all citizens through action, frequently with legal cases and other means. As set forth in the accompanying brief, Freedom Watch’s Amicus Brief would be useful given Freedom’s Watch’s experience in this arena, among other reasons.

Pursuant to Circuit Rule 29-3, Freedom Watch sought consent from Appellees and Appellant for the filing the Amicus Brief. Appellees have consented to this filing, and Appellant have yet to respond. However, it can be presumed that Appellant will consent, since this Amicus Brief is in support of Appellant. Thus, this Court is relieved of its duty to consider a motion pursuant to Circuit Advisory Committee Note to Rule 29-3. (“FRAP 29(a) permits the timely filing of an amicus curiae brief without leave of the Court if all parties consent to the filing of the brief; obtaining such consent relieves the Court of the need to consider a motion.”).

Dated: February 6, 2017

Respectfully submitted,

/s/ Larry Klayman, Esq

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**CERTIFICATE OF SERVICE**

I hereby certify that service of the foregoing motion and proposed brief will be delivered electronically on February 6, 2017, to counsel for Plaintiffs and Defendants through the District's Electronic Case Filing system.

/s/ Larry Klayman, Esq.  
Larry Klayman, Esq.