

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF ARIZONA

3
4 Friendly House, *et al.*,

5
6 Plaintiffs,

7 v.

8 Michael B. Whiting, *et al.*,

9 Defendants.

CASE NO. CV-10-1061-PHX-SRB

**MOTION FOR LEAVE
TO JOIN *AMICUS CURIAE*
BRIEF OF THE UNITED
MEXICAN STATES**

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11 The Plurinational State of Bolivia respectfully moves for leave of Court to
12 join the *amicus curiae* brief filed by the United Mexican States (“Mexico”) on
13 June 22, 2010, as modified pursuant to court order, challenging Arizona Senate
14 Bill 1070, 49th Leg., 2nd Reg. Sess., Ch. 113 (Az. 2010) (“SB 1070”).


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16 *Amicus curiae* and the Plurinational State of Bolivia share a commonality
17 of interests – differing not in substance, but merely in proportionality and degree
18 of impact – with regard to SB 1070. Similar to Mexico, The Plurinational State
19 of Bolivia has a substantial and compelling interest in ensuring that its bilateral
20 diplomatic relations with the government of the United States of America
21 (“United States” or “U.S.”) are transparent, consistent and reliable, and not
22 frustrated by the actions of individual U.S. states, in this case Arizona. As with
23 U.S.–Mexico relations, SB 1070 raises substantial challenges to the bilateral
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1 economic, immigration and security policies of the United States and the
2 Plurinational State of Bolivia.

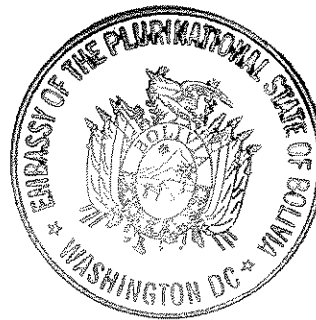
3 Furthermore, the Plurinational State of Bolivia has a substantial and
4 compelling interest to ensure that its citizens are accorded human and civil
5 rights when present in the United States in accordance with federal immigration
6 law. Like *amicus curiae*, the Plurinational State of Bolivia is gravely concerned
7 that SB 1070 will lead to racial profiling and disparate treatment of its
8 nationals. Accordingly, the Plurinational State of Bolivia has a substantial and
9 compelling interest to ensure that the ethnicity of its citizens is not used as basis
10 for state-sanctioned acts of discrimination.

11 As such, the Plurinational State of Bolivia has a compelling interest in
12 seeing SB 1070 be declared unconstitutional in its entirety.

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14 Respectfully Submitted,

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17 Erika Duenas
18 Chargé D'affaires



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**[PROPOSED] ORDER
GRANTING MOTION FOR
LEAVE TO JOIN *AMICUS
CURIAE* BRIEF OF THE
UNITED MEXICAN STATES**

This Court, having considered the Plurinational State of Bolivia's Motion for Leave to Join *Amicus Curiae* Brief of the United Mexican States, and good cause appearing, hereby GRANTS the Plurinational State of Bolivia's Motion:

IT IS HEREBY ORDERED that:

The Plurinational State of Bolivia's Motion be and is hereby, GRANTED.