

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

10
11 The Republic Of Chile respectfully moves for leave of Court to join the
12 *amicus curiae* brief filed by the United Mexican States (“Mexico”) on June 22,
13 2010, as modified pursuant to court order, challenging Arizona Senate Bill 1070,
14 49th Leg., 2nd Reg. Sess., Ch. 113 (Az. 2010) (“SB 1070”).

15
16 *Amicus curiae* and the Republic of Chile share a commonality of
17 interests – differing not in substance, but merely in proportionality and degree of
18 impact – with regard to SB 1070. Similar to Mexico, the Republic of Chile has
19 a substantial and compelling interest in ensuring that its bilateral diplomatic
20 relations with the government of the United States of America (“United States”
21 or “U.S.”) are transparent, consistent and reliable, and not frustrated by the
22 actions of individual U.S. states, in this case Arizona. As with U.S.–Mexico
23 relations, SB 1070 raises substantial challenges to the bilateral economic,
24
25

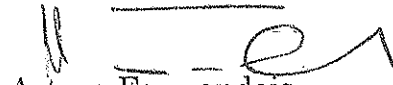
1 immigration and security policies of the United States and the Republic of
2 Chile.

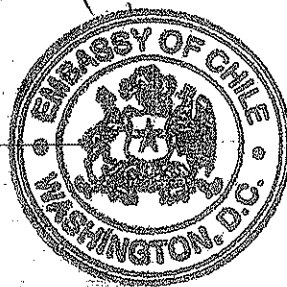
3 Furthermore, the Republic of Chile has a substantial and compelling
4 interest to ensure that its citizens are treated according human and civil rights
5 when present in the United States, under applicable federal immigration law.

6 Like *amicus curiae*, the Republic of Chile is gravely concerned that SB 1070
7 will lead to racial profiling and disparate treatment of its nationals. Accordingly,
8 the Republic of Chile has a substantial and compelling interest to ensure that
9 the ethnicity of its citizens is not used as basis for state-sanctioned acts of
10 discrimination.

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

13
14 Respectfully Submitted,

15 
16 Arturo Fermandois
17 Ambassador
18 Republic of Chile



19 [COUNTRY]
20 [ADDRESS]

21
22
23
24
25

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF ARIZONA

3
4 Friendly House, *et al.*,
5 Plaintiffs,

6 v.

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

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

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

9
10
11 This Court, having considered the **Republic of Chile's** Motion for Leave
12 to Join *Amicus Curiae* Brief of the United Mexican States, and good cause
13 appearing, hereby GRANTS the **Republic of Chile's** Motion:

14 IT IS HEREBY ORDERED that:

15
16 **Republic of Chile's** Motion be and is hereby, GRANTED.
17
18
19
20
21
22
23
24
25