

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

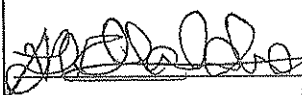
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16 *Amicus curiae* and the Republic of Costa Rica share a commonality of
17 interests – differing not in substance, but merely in proportionality and degree of
18 impact – with regard to SB 1070. Similar to Mexico, The Republic of Costa Rica
19 has 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 Republic of Costa Rica.

3 Furthermore, the Republic of Costa Rica has a substantial and compelling
4 interest to ensure that its citizens are accorded human and civil rights when
5 present in the United States in accordance with federal immigration law. Like
6 *amicus curiae*, the Republic of Costa Rica is gravely concerned that SB 1070 will
7 lead to racial profiling and disparate treatment of its nationals. Accordingly, the
8 Republic of Costa Rica 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 Costa Rica has a compelling interest in seeing SB
12 1070 be declared unconstitutional in its entirety.

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14 Respectfully Submitted,

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18 Ana Lorena Villalobos
19 Chargé d'Affaires a.i.
20 Embassy of Costa Rica
21 2114 S street, NW
22 Washington DC, 20008



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

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

14 IT IS HEREBY ORDERED that:

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16 Republic of Costa Rica's Motion be and is hereby, GRANTED.
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