

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF ARIZONA
3

4 Friendly House, *et al.*,
5
6 Plaintiffs,
7
8 v.
9 Michael B. Whiting, *et al.*,
10
11 Defendants.

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

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


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

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16 *Amicus curiae* and ECUADOR share a commonality of interests –
17 differing not in substance, but merely in proportionality and degree of impact –
18 with regard to SB 1070. Similar to Mexico, ECUADOR has a substantial and
19 compelling interest in ensuring that its bilateral diplomatic relations with the
20 government of the United States of America (“United States” or “U.S.”) are
21 transparent, consistent and reliable, and not frustrated by the actions of
22 individual U.S. states, in this case Arizona. As with U.S.–Mexico relations, SB
23 1070 raises substantial challenges to the bilateral economic, immigration and
24 security policies of the United States and ECUADOR.
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1 Furthermore, ECUADOR has a substantial and compelling interest to
2 ensure that its citizens are accorded human and civil rights when present in the
3 United States in accordance with federal immigration law. Like *amicus curiae*,
4 ECUADOR is gravely concerned that SB 1070 will lead to racial profiling and
5 disparate treatment of its nationals. Accordingly, ECUADOR has a substantial
6 and compelling interest to ensure that the ethnicity of its citizens is not used as
7 basis for state-sanctioned acts of discrimination.

8 As such, ECUADOR has a compelling interest in seeing SB 1070 be
9 declared unconstitutional in its entirety.

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11 Respectfully Submitted,

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14 _____
15 AMBASSADOR OF ECUADOR
16 ECUADOR
17 2535 15th st. NW
18 Washington D.C. 20009
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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 ECUADOR's Motion for Leave to Join
12 *Amicus Curiae* Brief of the United Mexican States, and good cause appearing,
13 hereby GRANTS ECUADOR's Motion:

14 IT IS HEREBY ORDERED that:

15 ECUADOR's Motion be and is hereby, GRANTED.
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