

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.*,

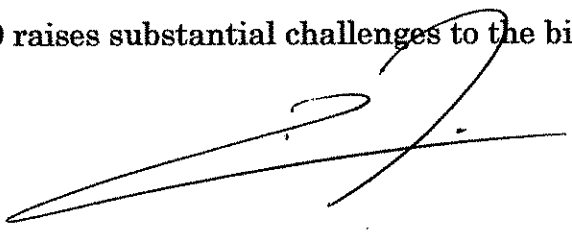
9 Defendants.

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 Paraguay 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").

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16 *Amicus curiae* and the Republic of Paraguay 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 Paraguay
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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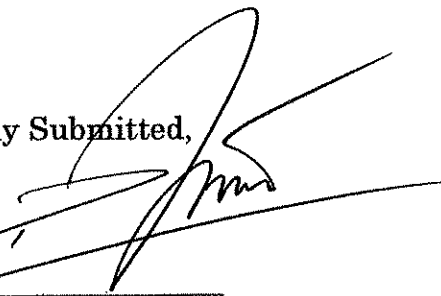


1 economic, immigration and security policies of the United States and the
2 Republic of Paraguay.

3 Furthermore, the Republic of Paraguay 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 Paraguay is gravely concerned that SB 1070 will
7 lead to racial profiling and disparate treatment of its nationals. Accordingly, the
8 Republic of Paraguay 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 Paraguay 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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20 Washington, DC 20008
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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Friendly House, *et al.*,
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v.

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

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

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

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

IT IS HEREBY ORDERED that:

The Republic of Paraguay's Motion be and is hereby, GRANTED.