

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
10 Defendants.

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

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

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

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

Respectfully Submitted,



CHIEF OF MISSION
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Deputy Chief of Mission

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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 Peru's Motion for Leave to Join *Amicus*
12 *Curiae* Brief of the United Mexican States, and good cause appearing, hereby
13 GRANTS Peru's Motion:

14 IT IS HEREBY ORDERED that:

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