

FILED
SUPREME COURT
STATE OF WASHINGTON
5/8/2019 2:30 PM
BY SUSAN L. CARLSON
CLERK

No. 95707-0

IN THE SUPREME COURT FOR THE STATE OF WASHINGTON

CITY OF SHORELINE,

Respondent

v.

SOLOMON MCLEMORE

Petitioners.

**SUPPLEMENTAL MOTION FOR LEAVE TO FILE *AMICI*
CURIAE MEMORANDUM IN SUPPORT OF
RECONSIDERATION OF THE AMERICAN CIVIL LIBERTIES
UNION OF WASHINGTON, WASHINGTON ASSOCIATION OF
CRIMINAL DEFENSE LAWYERS, WASHINGTON DEFENDER
ASSOCIATION, WASHINGTON IMMIGRANT SOLIDARITY
NETWORK, AND ONE AMERICA**

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I. RELIEF REQUESTED

Pursuant to RAP 12.4(i), amici file this supplemental motion adding organizations joining the amicus memorandum in support of reconsideration.

II. IDENTITY AND INTEREST OF *AMICI CURIAE*

The identity and interest of the American Civil Liberties Union of Washington (“ACLU”), Washington Association of Criminal Defense Lawyers, and Washington Defender Association have already been provided in a prior amicus motion in this case.

Amicus Washington Immigrant Solidarity Network (“WAISN”) is a grassroots coalition made up of over 100 immigrant and refugee rights organizations and individuals in Washington. WAISN’s mission is to protect and empower communities by providing support, capacity and resources to build power and a united voice in Washington, establishing tools to resist anti-immigrant and anti-refugee activities, and galvanizing communities for mobilization and collective action.

Amicus One America OneAmerica is a civic engagement, organizing and advocacy organization grounded in immigrant and refugee communities in Washington State. OneAmerica’s mission is to advance democracy and justice at the local, state and national level through building power in immigrant and refugee communities, with key allies. Its

members are immigrant and refugee communities who live in constant fear that immigration enforcement authorities may unexpectedly come to their doors or worksites, often with administrative warrants, looking for individuals that may be deportable. One America's members deal with racial profiling by local and federal law enforcement agencies and uncertainty over the role of local law enforcement in immigrant and refugee communities related to federal immigration enforcement mandates. OneAmerica is a leading voice in Washington State on matters related to human rights and civil liberties, grounded in the experience of its members.

III. FAMILIARITY WITH ISSUES AND RECORD

Undersigned counsel have read the parties' briefs and the lower court rulings.

IV. ISSUE TO BE ADDRESSED BY *AMICI*

Whether reconsideration should be granted because of the harmful confusion, impacting thousands of Washingtonians, caused by the 4-4 ruling of the Court in this case.

V. WHY AMICUS BRIEFING WILL ASSIST THE COURT

This case involves significant constitutional law issues. The issues presented impact the public interest. Amici can provide a wider

perspective than the parties on the issues before the Court, especially because they all engage in providing know-your-rights information to the public. A fully informed decision is essential, and the additional authority and impacts described by amici will be helpful to the Court.

VI. CONCLUSION

Amici respectfully request that the Court grant leave to file the memorandum in support of reconsideration filed with this Motion.

RESPECTFULLY SUBMITTED this 8th day of May, 2019.

By: /s/Nancy L. Talner

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PROOF OF SERVICE

I hereby certify under penalty of perjury of the laws of the state of Washington that on the 8th day of May 2019, a copy of the foregoing SUPPLEMENTAL MOTION FOR LEAVE TO FILE *AMICI CURIAE MEMORANDUM IN SUPPORT OF RECONSIDERATION OF THE AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON, WASHINGTON ASSOCIATION OF CRIMINAL DEFENSE LAWYERS, WASHINGTON DEFENDER ASSOCIATION, WASHINGTON IMMIGRANT SOLIDARITY NETWORK, AND ONE AMERICA* was electronically served upon counsel of record:

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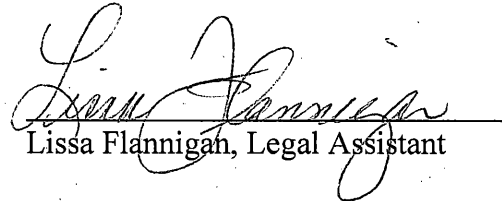
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DATED this 8th day of May 2019.


Lissa Flannigan, Legal Assistant

PIERCE COUNTY ASSIGNED COUNSEL

May 08, 2019 - 2:30 PM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 95707-0
Appellate Court Case Title: City of Shoreline v. Solomon McLemore
Superior Court Case Number: 16-1-07811-3

The following documents have been uploaded:

- 957070_Briefs_20190508142011SC918041_3249.pdf
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Motion 1 - Other
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Comments:

Attached are the Supplemental Motion For Leave to File Amici Curiae Memorandum and Amici Curiae Memorandum of the ACLU, WACDL, WDA, WISN and One America in Support of Reconsideration

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