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STATE OF CALIFORNIA, STATE OF MAINE, STATE OF MARYLAND, and STATE OF MINNESOTA,  
  
Plaintiffs,  
  
v.  
  
U.S. DEPARTMENT OF HOMELAND SECURITY, ELAINE DUKE, in her official capacity as Acting Secretary of the Department of Homeland Security, and the UNITED STATES OF AMERICA,  
  
Defendants.

CASE NO. 17CV-05235-WHA

CITY OF SAN JOSE, a municipal corporation  
  
Plaintiff,  
  
v.  
  
DONALD J. TRUMP, President of the United States, in his official capacity, ELAINE C. DUKE, in her official capacity, and the UNITED STATES OF AMERICA,  
  
Defendants

CASE NO. 17CV-05329-WHA

DULCE GARCIA, MIRIAM GONZALEZ AVILA, SAUL JIMENEZ SUAREZ, VIRIDIANA CHABOLLA MENDOZA, NORMA RAMIREZ, and JIRAYUT LATTHIVONGSKORN,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES OF AMERICA, DONALD J. TRUMP, in his official capacity as President of the United States, U.S. DEPARTMENT OF HOMELAND SECURITY, and ELAINE DUKE, in her official capacity as Acting Secretary of Homeland Security,  
  
Defendants

CASE NO. 17CV-05380-WHA

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28

TABLE OF CONTENTS

	Page
INTRODUCTION .....	1
ARGUMENT .....	3
I.    DACA Students Enrolled at Amici Institutions Are Some of the Most Gifted and Motivated Young People in the World.....	3
II.   Rescinding DACA Harms Amici Students and Alumni, and Deprives Both Amici Institutions and the Country of Their Promise.....	7
A.   The September Memorandum Has a Devastating Impact on DACA Recipients.....	7
B.   Rescinding DACA Prevents Undocumented Students from Fully Benefitting From and Contributing to Amici's Institutions.....	8
C.   Rescinding DACA Deprives the Nation of Invaluable Resources....	10
CONCLUSION.....	13



1  
2  
3  
4  
5  
6  
7  
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14  
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3	
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8	
9	
10	
11	
12	
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## INTRODUCTION

Amici are nineteen distinguished American institutions of higher education. Amici have educated and helped launch the careers of many celebrated leaders and innovators in all fields, including more than 200 Nobel Prize recipients, half of the astronauts who have walked on the moon, dozens of Fortune 500 CEOs, and numerous Academy Award and Pulitzer Prize artists and authors. And every day, amici















1 While DACA did not provide our students and alumni a path to citizenship, it did offer  
2 them a measure of security and access to opportunities for educational and professional  
3 development. As Juan Jose Martinez, a sophomore at Georgetown, whose goal is someday to  
4 “work for the government to help achieve what is best for America in the world and to help  
5 make the world a safer place”—put it:

6 Thanks to DACA, I now have a part-time job on campus and can help  
7 ease the cost of college on my parents. Thanks to DACA I can feel  
8 safe and confident while traveling, whether it be to attend school or  
9 to visit my family. Thanks to DACA I can focus on my studies  
10 without worrying that it may all be taken away from me at any  
11 second. I have always thought of myself as an American, but it is  
12 thanks to DACA that I can begin to truly feel like one, too.

13 Rescinding DACA wrests from Juan and hundreds of thousands of strivers like him the  
14 sense of safety and possibility that they deserve. Now, through no fault of their own, they face  
15 the terrifying prospect of having to return to a life in which they have little chance of making the  
16 best use of their hard-earned

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1 “debunk misconceptions and connect immigration to current events” under her leadership,  
2 PIR conducted “undoctrinings . . . [to] mak[e] sure as many student leaders as possible know  
3 what it even means to be an undocumented person.”<sup>21</sup>

4 True, numerous DACA recipients have continued to speak publicly about their legal status  
5 despite the September Memorandum including the many students who agreed to the use of their  
6 name in this brief. But the policy reversal places these students, and the many more whom it ha

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CONCLUSION

For the foregoing reasons, the September Memorandum impedes the ability of the undersigned institutions to advance ~~the~~ missions, imposes a direct harm on their current students and alumni, and deprives the ~~entire~~ United States of the benefit of DACA students' considerable talents. Accordingly, the Court should grant Plaintiffs' request for provisional relief.

Dated: November 1 2017