

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CITIZENS FOR RESPONSIBILITY AND ETHICS IN  
WASHINGTON, RESTAURANT OPPORTUNITIES  
CENTER (ROC) UNITED, INC., JILL PHANEUF, AND  
ERIC GOODE,

Plaintiffs,

- v -

DONALD J. TRUMP,  
IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNITED  
STATES OF AMERICA,

Defendant.

17 Civ. 458 (GBD)

**NOTICE OF MOTION OF *AMICUS CURIAE* SCHOLAR SETH BARRETT TILLMAN  
AND PROPOSED *AMICUS CURIAE* JUDICIAL EDUCATION PROJECT FOR LEAVE  
TO FILE RESPONSE TO *AMICI CURIAE* BY CERTAIN LEGAL HISTORIANS**

PLEASE TAKE NOTICE that *Amicus Curiae* scholar Seth Barrett Tillman and proposed *amicus curiae* Judicial Education Project (JEP), through their respective undersigned counsel, will move this Court before Honorable George B. Daniels, United States District Judge for the Southern District of New York, at a date and time directed by the Court, for entry of an order granting Tillman and JEP permission to file a response to *Amici Curiae* Legal Historians [ECF No. 70], pursuant to L. Civ. R. 7.1 and the Court's inherent power, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York  
September 19, 2017

Respectfully submitted,

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