

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

SAMEH SAMI S. KHOUZAM,	)	
	)	
<i>Petitioner,</i>	)	Case No. 3:CV-07-0992
	)	(Judge Thomas I. Vanaskie)
v.	)	
	)	
THOMAS H. HOGAN, <i>et al.</i> ,	)	
	)	
<i>Respondents.</i>	)	

**UNOPPOSED MOTION TO FILE *AMICUS CURIAE* BRIEF ON BEHALF
OF THE AMERICAN CENTER FOR LAW AND JUSTICE AND THE
EUROPEAN CENTER FOR LAW AND JUSTICE IN SUPPORT OF
PETITIONER SAMEH SAMI S. KHOUZAM**

Pursuant to Local Rule 7.1, applicants The American Center for Law and Justice and The European Center for Law and Justice, through their undersigned counsel, respectfully move this Honorable Court to grant its Unopposed Motion for leave to file their brief *amicus curiae* in support of Petitioner Sameh Sami S. Khouzam, in the above-captioned action.

In support of said motion, the American Center for Law and Justice and the European Center for Law and Justice state their interest in this matter:

The American Center for Law and Justice (ACLJ) is a public interest law firm committed to ensuring the ongoing viability of constitutional freedoms in the United States, including the defense of religious liberties. ACLJ attorneys have argued or participated as *amicus curiae* in numerous cases involving constitutional issues before the Supreme Court of the United States as well as lower federal and state courts.

The European Center for Law and Justice is an international law firm dedicated to protecting human rights and religious freedoms for people of faith in Europe. Attorneys for the ECLJ have been counsel in numerous cases before the European Court of Human Rights. Additionally, the ECLJ is an NGO in Special Consultative Status with the Economic and Social Council of the United Nations.

The proper resolution of this case is a matter of substantial organizational concern to the ACLJ and the ECLJ because of their commitment to religious freedom, including the freedom to avoid deportation to countries where religious persecution is rampant.

WHEREFORE, for the foregoing reasons, the ACLJ and the ECLJ respectfully request that this Honorable Court grant their Unopposed Motion for leave to file their brief *amicus curiae* in support of Sameh Sami S. Khouzam.

Respectfully submitted,

/s/

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**Pro Hac Vice* applications pending.

Attorneys for Amici Curiae

CERTIFICATE OF CONCURRENCE and NON-CONCURRENCE

Applicants ACLJ and ECLJ sought concurrence from the following counsel on behalf of the parties:

Lead Counsel for Petitioner Sameh Sami S. Khouzam, AMRIT SINGH, Esq., has consented in writing to allow amici ACLJ and ECLJ to file an *amicus curiae* brief in support of Sameh Sami S. Khouzam, the Petitioner in the above-captioned action.

On July 19, 2007, Applicants ACLJ and ECLJ sought written consent from Counsel for Respondents, Douglas Ginsburg and Nathanael J. Byerly. Counsel for applicants spoke with Douglas Ginsburg via telephone on or about July 20, 2007, who expressed that Respondents would not consent, but also noted that Respondents would not oppose the motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

AND NOW, this _____ day of _____ 2007, Andrew L. Swope, a member of the firm Kirkpatrick & Lockhart Preston Gates Ellis LLP, attorney for *amici curiae*, does hereby certify that I served this day the within *Unopposed Motion To File Amicus Curiae Brief On Behalf Of The American Center For Law And Justice And The European Center For Law And Justice In Support Of Petitioner Sameh Sami S. Khouzam* by First Class U.S. Mail to the party or attorney of record as follows:

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