

**UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT
No. 18-2574**

SHARONELL FULTON, ET AL.,
APPELLANTS,

v.

CITY OF PHILADELPHIA, ET AL.,

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
No. 2:18-cv-02075-PBT (HONORABLE PETRESE B. TUCKER)

**MOTION OF *AMICUS CURIAE* COALITION OF RELIGIOUS AND
RELIGIOUSLY AFFILIATED ORGANIZATIONS
FOR LEAVE TO FILE BRIEF IN SUPPORT OF APPELLEES CITY
OF PHILADELPHIA, ET AL.**

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Dated: October 4, 2018

Pursuant to Federal Rules of Appellate Procedure 27 and 29(a)(3), proposed *amici curiae*, a coalition of religious and religiously affiliated organizations,¹ respectfully move for leave to file the attached *amicus curiae* brief in support of Appellees in the above-captioned case.

As set forth more fully in the accompanying brief, *amici curiae* are well-positioned to assist the court in this case because they are advocates for religious equality and staunchly believe that overly broad requests for religious exemptions from generally applicable and neutral anti-discrimination laws actually harm freedom of faith and conscience. Anti-discrimination laws have long played a crucial role in protecting the religious liberty of both the majority and minority. Thus, *amici* firmly believe that Appellants' requested faith-based exemption to such laws would severely limit anti-discrimination protections and undermine one of our nation's core values—that in the marketplace, no one should suffer discrimination because of his or her religious identity or beliefs.

¹ Proposed *amici curiae* include the Anti-Defamation League, Asian Pacific American Advocates, Bend the Arc: A Jewish Partnership for Justice, Hindu American Foundation, Interfaith Alliance Foundation, the Japanese American Citizens League, Jewish Social Policy Action Network, Jewish Women International, Keshet, Muslim Advocates, National Council of Jewish Women, People for the American Way Foundation, Sikh Coalition, South Asian Americans Leading Together, and T'ruah: The Rabbinic Call for Human Rights have no parent corporations.

Amici's brief seeks to assist the court in evaluating the implications of an adverse ruling for religious minorities in particular and religious liberty more generally. Such a ruling would only serve to undercut anti-discrimination protections enforced by other courts, open the door to religious minorities being turned away from services because of their religion without legal recourse, and ultimately undermine the free exercise rights of us all.

Wherefore, *amici curiae* respectfully request that the court grant them leave to file the *amici curiae* brief attached to this Motion.

Dated: October 4, 2018

Respectfully submitted,

/s/ M. Duncan Grant

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CERTIFICATE OF SERVICE

I certify that on October 4, 2018, a true and correct copy of the foregoing motion was served on all parties to this appeal, via the CM/ECF system, pursuant to Third Circuit Local Appellate Rule 113.4, because counsel for all parties are Filing Users under that Rule and will be served electronically by the Notice of Docket Activity.

/s/ M. Duncan Grant

M. Duncan Grant