IN THE

Supreme Court of the United States

DEPARTMENT OF HOMELAND SECURITY, ET AL.,

Petitioners,

υ.

REGENTS OF THE UNIVERSITY OF CALIFORNIA, ET AL.,

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

[Caption Continued on Following Page]

BRIEF FOR THE AMERICAN PROFESSIONAL SOCIETY ON THE ABUSE OF CHILDREN, THE AMERICAN ACADEMY OF PEDIATRICS, THE CENTER FOR LAW AND SOCIAL POLICY, AND 33 CHILD ADVOCACY ORGANIZATIONS, MEDICAL PROFESSIONALS, AND CHILD DEVELOPMENT EXPERTS AS AMICI CURIAE IN SUPPORT OF RESPONDENTS

Kelsi Brown Corkran Melanie R. Hallums Orrick, Herrington & Sutcliffe LLP 1152 15th Street, N.W. Washington, DC 20005 (202) 339-8400

Mary Kelly Persyn

Counsel of Record

PERSYN LAW & POLICY

912 Cole Street

San Francisco, CA 94117

(628) 400-1254

marykelly@persynlaw.com

Counsel for Amici Curiae



DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, ET AL.,

Petitioners,

v

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, ET AL.,

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE D.C. CIRCUIT

KEVIN K. MCALEENAN, ACTING SECRETARY OF HOMELAND SECURITY, ET AL.,

Petitioners,

v.

 $\begin{array}{c} \text{Martin Jonathan Batalla Vidal, et al.,} \\ Respondents. \end{array}$

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT



TABLE OF CONTENTS

		P	age
TA	BLI	E OF AUTHORITIES	iii
IN'		ODUCTION AND INTEREST OF MICI CURIAE	1
SU	MM	MARY OF ARGUMENT	12
AR	GU	MENT	15
I.		escinding DACA Places Children At Risk Immediate Harm	15
II.	Da	nding DACA Protection Will Likely amage Children's Mental And Physical ealth	19
	A.	Even the threat of detention and deportation can cause children to suffer symptoms of traumatic stress and post-traumatic stress disorder and impacts birth outcomes	19
	В.	DACA rescission will likely cause income and food insecurity	24
	C.	DACA rescission threatens to cut off access to reliable health care	25
	D.	DACA rescission puts children at risk of parental separation and reduced access to educational opportunities	29
	E.	DACA rescission puts children at risk of traumatic stress, causing immediate and long-term damage.	32



	F. DACA protection benefits children's health	34
III.	It Is In Society's Interest To Protect	01
	Children From Harm.	36
CONCLUSION		



TABLE OF AUTHORITIES

Page(s)
Cases
Brown v. Board of Educ. of Topeka, Shawnee Cty., Kan., 347 U.S. 483 (1954)36
Brown v. Entm't Merchants Ass'n, 564 U.S. 786 (2011)36
Ginsberg v. New York, 390 U.S. 629 (1968)36
Moore v. East Cleveland, 431 U.S. 494 (1977)37
Prince v. Massachusetts, 321 U.S. 158 (1944)36
Regents of the Univ. of Cal. v. U.S. Dep't of Homeland Sec., 279 F. Supp. 3d 1011 (N.D. Cal. 2018)13
Other Authorities
164 Cong. Rec. S1731 (daily ed. Mar. 14, 2018) (statement of Sen. Wyden)
Am. Academy of Pediatrics, AAP Statement on Protecting Immigrant Children (Jan. 25, 2017), https://tinyurl.com/y526he2n



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

