

No. 22A184

In the Supreme Court of the United States

YESHIVA UNIVERSITY AND PRESIDENT ARI BERMAN,

Applicants,

v.

YU PRIDE ALLIANCE, MOLLY MEISELS, DONIEL WEINREICH,
AMITAI MILLER, AND ANONYMOUS,

Respondents.

ON EMERGENCY APPLICATION FOR STAY PENDING APPELLATE REVIEW OR
PETITION FOR WRIT OF CERTIORARI AND STAY

**MOTION OF PROFESSOR DOUGLAS LAYCOCK FOR LEAVE TO FILE
BRIEF AS *AMICUS CURIAE* IN SUPPORT OF APPLICANTS
WITHOUT 10 DAYS' NOTICE AND IN PAPER FORMAT**

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Professor Douglas Laycock respectfully moves for leave to file the enclosed brief as *amicus curiae* in support of applicants. Professor Laycock is one of the nation's leading authorities on the law of religious liberty, having taught and written about the subject for more than four decades at the University of Texas, the University of Virginia, the University of Chicago, and the University of Michigan. He has testified many times before Congress and the Texas legislature and has argued many religious freedom cases in the courts, including the U.S. Supreme Court. He was lead counsel for petitioner in *Hosanna-Tabor Evangelical Lutheran Church and School v. EEOC*, 565 U.S. 171 (2012). His many writings on religious liberty have been republished in a five-volume collection under the overall title *Religious Liberty*.

In Professor Laycock's view, religious institutions must be free from governmental interference in making decisions about internal religious affairs. Protecting this religious autonomy is critical to safeguarding the values protected by the Constitution's Religion Clauses, including protecting the right of religious institutions to exercise their own faith and mission, and preventing state entanglement in religious doctrine. The proposed brief analyzes these and other relevant legal issues from *amicus's* unique perspective.

Amicus also moves to file the brief without ten days' notice to the parties of their intent to file as ordinarily required by Sup. Ct. R. 37.2(a) and to file this brief in an unbound format on 8½-by-11-inch paper rather than in booklet form. These requests are necessary due to the press of time related to the emergency nature of the application.

Counsel for *amicus* notified counsel for applicants and respondents to obtain consent for the proposed brief. All parties consented.

Respectfully submitted,

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