

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 THE ARCHDIOCESE OF NEW YORK, BIOLA UNIVERSITY,
BRIGHAM YOUNG UNIVERSITY, CEDARVILLE UNIVERSITY, THE
CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, THE ETHICS
AND RELIGIOUS LIBERTY COMMISSION, HOUSTON BAPTIST
UNIVERSITY, LIBERTY UNIVERSITY, THE UNITED STATES
CONFERENCE OF CATHOLIC BISHOPS, AND WHEATON COLLEGE FOR
LEAVE TO FILE BRIEF AS *AMICI CURIAE* IN SUPPORT OF APPLICANTS
WITHOUT 10 DAYS' NOTICE AND IN PAPER FORMAT**

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September 2, 2022

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The Archdiocese of New York, Biola University, Brigham Young University, Cedarville University, The Church of Jesus Christ of Latter-day Saints, The Ethics and Religious Liberty Commission, Houston Baptist University, Liberty University, the United States Conference of Catholic Bishops, and Wheaton College respectfully move for leave to file the enclosed brief as *amici curiae* in support of applicants. Movants are religious education and service organizations that together minister to millions of congregants and tens of thousands of students from Pre-K through graduate degrees. Like countless other religious organizations, movants orchestrate their efforts according to their beliefs and through corporate forms. Movants thus possess extensive experience and understanding of how the Constitution's protections of religious autonomy enables them to live out their faiths and missions free from state interference.

Without this protection of religious autonomy, movants and many other religious institutions may soon be forced to face the same impossible choice as Yeshiva University: abandon your faith or risk contempt or other legal penalties. The proposed brief explains in greater depth the history upon which the Court has relied in affirming the scope of this autonomy and analyzes other relevant legal issues relating to church autonomy from movant's unique perspective.

Movants also move 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 movants notified counsel for applicants and respondents to obtain consent for the proposed brief. All parties consented.

Respectfully submitted,

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