

IN THE SUPREME COURT OF THE UNITED STATES

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No. 25-965

DANIEL GRAND, PETITIONER

v.

CITY OF UNIVERSITY HEIGHTS, OHIO, ET AL.

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

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MOTION OF THE UNITED STATES FOR LEAVE TO  
PARTICIPATE IN ORAL ARGUMENT AS AMICUS CURIAE  
AND FOR DIVIDED ARGUMENT

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Pursuant to Rules 21, 28.4, and 28.7 of the Rules of this Court, the Solicitor General, on behalf of the United States, respectfully moves for leave to participate in oral argument in this case as amicus curiae supporting petitioner and requests that the United States be allowed ten minutes of argument time. Petitioner consents to this motion and has agreed to cede ten minutes of argument time to the United States. Accordingly, if this motion were granted, argument time would be divided as follows: 20 minutes for petitioner, 10 minutes for the United States, and 30 minutes for respondents.

This case involves when claims alleging violations of the First Amendment, the Fourteenth Amendment, and the Religious Land Use and Institutionalized Persons Act of 2000 (RLUIPA), 42 U.S.C. 2000cc et seq., are ripe. The United States enforces RLUIPA and has a significant interest in the proper application of that statute. 42 U.S.C. 2000cc-2(f). The United States also has a significant interest in protecting its citizens' constitutional rights from state interference. And the United States has a significant interest in the development of justiciability principles, which routinely affect suits involving the federal government. The United States filed an amicus brief in the court of appeals arguing that the district court erred in holding that petitioner's claims are not ripe, and it has filed an amicus brief to the same effect in this Court.

The United States has previously presented oral argument as amicus curiae in cases concerning the justiciability of suits against state defendants. See, e.g., First Choice Women's Resource Ctrs. v. Davenport, 608 U.S. 174 (2026) (No. 24-781); Uzuegbunam v. Preczewski, 592 U.S. 279 (2021) (No. 19-968); Wittman v. Personhuballah, 578 U.S. 539 (2016) (No. 14-1504); Susan B. Anthony List v. Driehaus, 573 U.S. 149 (2014) (No. 13-193). And it has previously presented oral argument as amicus curiae in cases involving RLUIPA. See, e.g., Landor v. Louisiana Dep't of Corr. & Public Safety, 146 S. Ct. 1931 (2026) (No. 23-1197); Ramirez v.

Collier, 595 U.S. 411 (2022) (No. 21-5592); Holt v. Hobbs, 574 U.S. 352 (2015) (No. 13-6827). The United States' participation in oral argument in this case accordingly may be of material assistance to the Court.

Respectfully submitted.

D. JOHN SAUER  
Solicitor General  
Counsel of Record

SEPTEMBER 2026