

Record No. 25A443

BEFORE THE

United States Supreme Court

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

v.

**STATE OF ILLINOIS AND CITY OF
CHICAGO**

On Appeal from the United States Court of Appeals for
the Seventh Circuit, Record 25-2798

***MOTION FOR LEAVE TO FILE BRIEF OF
AMERICAN RIGHTS ALLIANCE AS AMICUS
CURIAE IN SUPPORT OF APPLICATION
FOR STAY***

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October 20, 2025

MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF

Proposed *Amicus Curiae* hereby respectfully requests that this Honorable Court grant leave for the American Rights Alliance to file an *Amicus Curiae* brief in the hope that its points and explanations will assist this Court in quickly observing from the lengthy record the importance of these issues.

This brief supports the Petitioner's (Defendant below), in Petitioner's Application To Vacate The Orders Issued by The United States District Court For The District Of Columbia And Request For An Immediate Administrative Stay.

Rule 37.3(2)(a) of the Rules of the Supreme Court requires among several other topics

An *amicus curiae* filing a brief under this subparagraph shall ensure that the counsel of record for all parties receive notice of its intention to file an *amicus curiae* brief at least 10 days prior to the due date for the *amicus curiae* brief, unless

the *amicus curiae* brief is filed earlier than 10 days before the due date.

However, the Petitioner, in his capacity as President of the United States, Donald Trump, only filed his Application for Stay late on Friday, October 17, 2025. *Amicus Curiae* not only had to draft and research this brief but evaluate a decision to participate.

Because of the short time spans involved in, the timing when counsel was included, and staff's understanding that this Court had moved away from the requirement of the formality of seeking leave to file a brief, *Amici Curiae* did not inform the parties prior to finalizing the brief today. The final brief has been emailed with this Motion to all parties today.

Proposed *Amicus Curiae*, the American Rights Alliance (ARA) is an IRS Code 501(c)(3) nonprofit, tax deductible organization. ARA is a coalition of legal professionals, advocates, and strategists committed to defending the First Amendment, protecting election integrity, and ensuring transparency in democratic processes. ARA works to expose fraud, misconduct, and censorship while empowering individuals to speak freely and

without fear. We stand as a shield for those whose voices are marginalized and as a force holding systems accountable to safeguard the core principles of a free and just society.

The ARA, founded by attorney Evan Turk and represented herein by attorney Peter Ticktin, comprises distinguished legal advocates dedicated to preserving constitutional governance and protecting the separation of powers. Treniss Evans, a member of the American Rights Alliance, supports ARA's efforts to reinforce executive authority and end judicial interference in national security matters. It is described at www.AmericanRightsAlliance.org and accessible at 303 Evernia Street, Suite 300, West Palm Beach, Florida 33401.

CONCLUSION

Amici asks the Court to consider these circumstances, details and analyses and to grant leave of Court for *Amicus Curiae* to file this brief and ultimately to grant a *writ of certiorari* and injunction at the appropriate time in the procedural history unfolding.

October 20, 2025 /s/ Peter Ticktin
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