
**UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT**

ASHLEY B. WOMACK,)	Civil appeal from the United
)	States District Court for the
Plaintiff-Appellee,)	Eastern District of Texas,
)	Sherman Division
v.)	
)	USDC No. 4:15-CV-601
RUSTIN P. WRIGHT,)	
)	Chief Judge Ron Clark, presiding
Defendant-Appellant.)	Magistrate Don Bush, assigned

MOTION FOR LEAVE TO FILE

AMICUS CURIAE BRIEF OF FAMILIES CIVIL LIBERTIES UNION

Gregory T. Roberts, Founder & President
Families Civil Liberties Union
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MOVANT'S INTEREST

The Families Civil Liberties Union (“FCLU”) hereby moves this Court, pursuant to Rule 29, Federal Rules of Appellate Procedure, for leave to file the attached brief as amicus curiae urging reversal in support of Defendant-Appellant. No party has opposed this motion. Defendant-Appellant has consented to the filing of the FCLU’s amicus brief.

The FCLU is a professional, politically neutral, national activist organization headquartered in New York City with members in almost all States including many in Texas. Our mission is to promote nationwide equal-gender rights through education and encouraging standardized practices in relation to Family and Domestic Relations Laws.

REASONS FOR AND RELEVANCE OF FCLU AMICUS CURIAE BRIEF

The FCLU is well positioned to assist the Court in its evaluation of the parties’ arguments because of the FCLU’s diverse membership and extensive breath of expertise of the FCLU Board of Directors. The FCLU promotes the interests of its members throughout the country on civil rights issues of critical concern to parents. As a result, the organization has a wealth of knowledge related to Family and Domestic Relations Laws and is uniquely suited to provide the Court with significant guidance.

FCLU submits that its amicus curiae brief will aid the court in offering analysis of the doctrinal underpinnings of Federal-State comity and Federal Regulations that impact parent. Specifically, the proposed amicus curiae brief explains the pressing issue of Federal Regulations having substantial effect on State Family Courts.

CONCLUSION

For the foregoing reasons, the Families Civil Liberties Union hereby requests the Court grant leave to file the attached amicus curiae brief in Appellate Cause No.: 16-41192, urging reversal in support of Defendant-Appellant, Rustin Wright.

Respectfully submitted November 21, 2016.



Gregory T. Roberts, Founder & President
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CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of November, 2016, a true and complete copy of the foregoing *MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF FAMILIES CIVIL LIBERTIES UNION* by depositing same via first-class United States mail, postage prepaid, has been duly served on:

(last-known counsel for Appellee)

Jennifer M. Gibo, #24032343
Law Office of Jennifer Gibo
109 1st Street SE
Paris, TX 75460

and, that I further certify that, on this same 21st day of November, 2016, the requisite number of true and complete copies of the foregoing *MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF FAMILIES CIVIL LIBERTIES UNION* by depositing said copies via “overnight” or similar express and tracked first-class United States mail or equivalent carrier, postage prepaid, has been duly served on:

Lyle W. Cayce, Clerk
Fifth Circuit Court of Appeals
600 S. Maestri Place
New Orleans, LA 70130

Dated November 21, 2016.



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