

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 18-490

Caption [use short title]

Motion for: Leave to file Amicus Brief

Set forth below precise, complete statement of relief sought:

Motion by The Bronx Defenders, et. al,

Stallworth, et. al. v. Joshi, et. al

to file an Amicus Brief in support of the Plaintiffs-Appellants

MOVING PARTY: Amici Curae (The Bronx Defenders, et al.)

OPPOSING PARTY: Meera Joshi, Chris Wilson, Stas Skarbo, City of NY

Plaintiff Defendant

Appellant/Petitioner Appellee/Respondent

MOVING ATTORNEY: Runa Rajagopal

OPPOSING ATTORNEY: Susan Paulson

[name of attorney, with firm, address, phone number and e-mail]

The Bronx Defenders

NYC Law Department

360 East 161 Street, Bronx, New York 10451

100 Church Street, New York, NY 10007

347-842-1249, runar@bronxdefenders.org

212.356.0821, spaulson@law.nyc.gov

Court- Judge/ Agency appealed from: Hon. Richard Sullivan, Southern District of New York

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

Yes No (explain):

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND INJUNCTIONS PENDING APPEAL:

Has this request for relief been made below? Yes No

Has this relief been previously sought in this court? Yes No

Requested return date and explanation of emergency:

Opposing counsel's position on motion:

Unopposed Opposed Don't Know

Does opposing counsel intend to file a response:

Yes No Don't Know

Is oral argument on motion requested? Yes No (requests for oral argument will not necessarily be granted)

Has argument date of appeal been set? Yes No If yes, enter date:

Signature of Moving Attorney:

/s/Runa Rajagopal

Date: 4/4/2018

Service by: CM/ECF Other [Attach proof of service]

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

Docket No. 18-490

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Anthony Stallworth, Individually
and on behalf of all others similarly situated,
Parichay Barman, Individually and on behalf
of all others similarly situated, Noor Tani,
Individually and on behalf of all others
similarly situated, New York Taxi Workers
Alliance, Individually and on behalf of all
others similarly situated

Petitioner-Appellants

v.

Meera Joshi, Chris Wilson, Stas Skarbo,
City of New York

Declaration in Support of
Motion for Leave to File
Brief on Behalf of
Amici Curiae The Bronx
Defenders, et. al. in Support
of Plaintiffs-Appellants

Defendants-Appellees

-----X

I, Runa Rajagopal, declare under penalty of perjury, pursuant to 28 U.S.C. 1746,

that the foregoing statements are true and correct:

1. I am the Managing Director of the Civil Action Practice at The Bronx
Defenders, a nonprofit organization located at 361 East 161st Street,
Bronx, NY 10451.
2. My admission is pending to practice before the Second Circuit Court of
Appeals, I am over the age of 18 years and am not myself a party to the
above-captioned matter.

3. The Bronx Defenders submits the attached proposed brief *amici curiae* on behalf of ourselves and the following nonprofit organizations:
 - Community Service Society of New York
 - Brooklyn Defender Services
 - Legal Action Center
 - Neighborhood Defender Services of Harlem
 - Urban Justice Center
 - Youth Represent
4. Amici curiae are 7 organizations serving people with criminal justice involvement, open criminal cases and/or criminal conviction histories as they pursue employment, employment licenses, education and housing for themselves and their families.
5. The amici collectively have substantial knowledge as lawyers and advocates about the barriers faced by persons with open criminal cases or convictions as they try to obtain or maintain employment.
6. We submit this brief to provide argument, authorities and insight into why the TLC's current post-suspension hearing process offers nothing approaching due process for the drivers who rely on TLC licenses to provide for themselves and their families. Amici's Statements of Interest are included as an addendum to this proposed brief.

7. I received consent to submit an amicus brief in support of the Plaintiffs-Appellants by Daniel L. Ackman, counsel for Plaintiffs-Appellants.
8. Moreover, on April 3, 2018, Susan Paulson, Counsel for Defendants-Appellees, stated she does not object to our filing an amicus brief on behalf of Plaintiffs-Appellants.

WHEREFORE, it is respectfully requested that the proposed amicus brief be accepted for filing, *nunc pro tunc*, or the Court issue an order directing that such brief be separately uploaded to the ECF filing system.

Dated: Bronx, New York
 April 4th, 2018

/s/ Runa Rajagopal*, Esq.
Managing Director,
Civil Action Practice
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Pending admission.