



January 30, 2007

By Hand

J. Michael McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
LEGAL DEPARTMENT
NATIONAL OFFICE
125 BROAD STREET, 18TH FL.
NEW YORK, NY 10004-2400
T/212.549.2500
F/212.549.2651
WWW.ACLU.ORG

Re: *American Academy of Religion v. Chertoff*, 06-cv-0588 (PAC)

OFFICERS AND DIRECTORS
NADINE STROSSEN
PRESIDENT

Dear Mr. McMahon,

ANTHONY D. ROMERO
EXECUTIVE DIRECTOR

Enclosed for filing in the above captioned case please find the original and two copies of plaintiffs' Motion for Leave to File the Amended Complaint for Declaratory and Injunctive Relief.

KENNETH B. CLARK
CHAIR, NATIONAL
ADVISORY COUNCIL

RICHARD ZACKS
TREASURER

Respectfully,

Jameel Jaffer

Encl.

cc: David Jones
Kristin Vassello
Assistant United States Attorneys
86 Chambers Street
New York City, NY 10007

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ACADEMY OF RELIGION; AMERICAN
ASSOCIATION OF UNIVERSITY PROFESSORS;
PEN AMERICAN CENTER; TARIQ RAMADAN,

Plaintiffs,

v.

MICHAEL CHERTOFF, in his official capacity as
Secretary of the Department of Homeland Security;
CONDOLEEZZA RICE, in her official capacity as
Secretary of State,

Defendants.

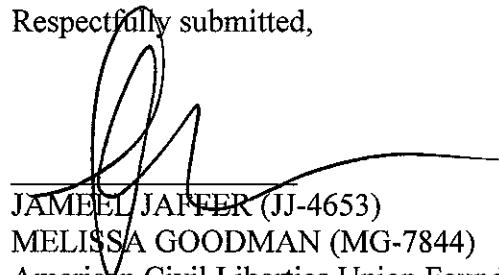
Case No. 06-588 (PAC)

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiffs American Academy of Religion (AAR), American Association of University Professors (AAUP), and PEN American Center (PEN) request leave to file the Amended Complaint for Declaratory and Injunctive Relief attached hereto as Exhibit A. Plaintiffs seek to file this Amended Complaint in order to reflect events that have transpired since plaintiffs filed the original Complaint on January 25, 2006.

By letter dated January 26, 2007, David Jones, counsel for defendants, consented in writing to plaintiffs' filing of the Amended Complaint. Mr. Jones's letter is attached hereto as Exhibit B.

Respectfully submitted,



JAMEEL JAFFER (JJ-4653)
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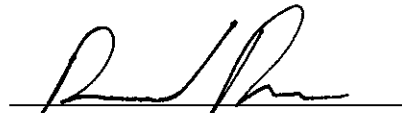
Attorneys for Plaintiffs

January 30, 2007

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2007, I delivered by overnight courier a true and correct copy of the foregoing: Plaintiffs' Motion for Leave to File Amended Complaint for Declaratory and Injunctive Relief to:

David Jones
Kristin Vassello
Assistant United States Attorneys
Southern District of New York
86 Chambers Street
New York, NY 10007



Reid Rowe