

**No. 23-12958**

---

IN THE  
**United States Court of Appeals**  
FOR THE ELEVENTH CIRCUIT

---

THE STATE OF GEORGIA  
*Appellee,*

v.

MARK RANDALL MEADOWS,  
*Appellant.*

---

On Appeal from the U.S. District Court  
For the Northern District of Georgia  
No. 23-cv-03621-SCJ, Hon. Steve C. Jones

---

**UNOPPOSED MOTION TO FILE BRIEF OF CONSTITUTIONAL LAW  
SCHOLARS AND FORMER STATE ATTORNEYS GENERAL AS AMICI  
CURIAE IN SUPPORT OF APPELLEES**

---

Michelle Kallen  
Marcus Childress  
Mary E. Marshall  
JENNER & BLOCK, LLP  
1099 New York Avenue NW  
Washington, DC 20001  
(202) 639-6093  
mkallen@jenner.com

*Counsel Amici Curiae*

## **SUPPLEMENTAL CERTIFICATE OF INTERESTED PARTIES**

The undersigned counsel of record certifies that amici curiae are unaware of any persons with any interest in the outcome of this litigation other than the signatories to this brief and their counsel, and those identified in the party and amicus briefs filed in this case. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal.

Dated: September 25, 2023

/s/ Michelle Kallen  
Michelle Kallen

*Counsel for Amici Curiae*

Amici curiae respectfully file this unopposed motion for leave to file a brief as amici curiae in support of the State of Georgia and of affirmance.<sup>1</sup>

1. Amici are a group of constitutional law scholars and former state attorneys general.

2. Professors-amici have dedicated their careers to the study of the Constitution and its guidance on the balance of federal and state power in our system of government. State official amici have a crucial perspective on the role states and the federal government play in law enforcement actions based on their more than four decades of combined service as state attorneys general. In that role, amici served as their states' chief law enforcement officers, and were elected by their states' citizens to uphold the state and federal constitutions.

3. Amici write to explain how the district court's decision accurately considers the role state and federal courts play in criminal prosecutions. In particular, amici wish to provide insight to the Court on the role that Supremacy Clause immunity plays in weighing whether removal is appropriate in this case.

4. Amici seek leave to file the attached 3187-word brief in support of the Defendant-Appellee the State of Georgia and of affirmance. The attached brief contains information "relevant to the disposition" of Mr. Meadow's removal motion

---

<sup>1</sup> Counsel for the State of Georgia consented to the filing of this brief. Counsel for Mr. Meadows does not oppose the filing of this brief.

that would be “desirable” for the Court to consider, and amici believe this perspective would benefit the Court. Fed. R. App. P. 29(a)(3).

5. Amici therefore respectfully request leave of the Court to file the attached brief.

September 25, 2023

Respectfully submitted,

/s/ Michelle Kallen

Michelle Kallen  
Marcus Childress  
Mary E. Marshall  
JENNER & BLOCK, LLP  
1099 New York Avenue NW  
Washington, DC 20001  
(202) 639-6093  
mkallen@jenner.com

*Counsel Amici Curiae*

## CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Fed. R. App. P. 27(d)(2)(A) because it contains 275 words, excluding the parts of the document exempted by Fed. R. App. P. 32(f).

This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 2013 in 14-point Times New Roman Font.

/s/ Michelle Kallen

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of September, 2023 a true and correct copy of the foregoing Motion was served via the court's CM/ECF system.

/s/ Michelle Kallen