
In the Supreme Court of the United States

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CHIKE UZUEGBUNAM, ET AL.,

Petitioners

STANLEY C. PRECZEWSKI, ET AL.,

Respondents.

**On Writ of Certiorari to The United States Court of Appeals
For the Eleventh Circuit**

**BRIEF OF THE NATIONAL CONFERENCE OF
STATE LEGISLATURES; THE COUNCIL OF STATE GOVERNMENTS;
THE NATIONAL ASSOCIATION OF COUNTIES; THE NATIONAL
LEAGUE OF CITIES; THE UNITED STATES CONFERENCE OF
MAYORS; THE INTERNATIONAL CITY/COUNTY MANAGEMENT
ASSOCIATION; THE INTERNATIONAL MUNICIPAL LAWYERS
ASSOCIATION; THE GOVERNMENT FINANCE OFFICERS
ASSOCIATION; THE NATIONAL SCHOOL BOARDS ASSOCIATION
AMICI CURIAE IN SUPPORT OF RESPONDENTS**

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*Key Senators Want to
Add New Federal Judgeships This Year*

*Civil Rights Suits Against Schools More Than
Double in Last Four Years*

*Senators Urge Addition of
Judgeships as Caseloads Balloon*

INTEREST OF AMICI¹

SUMMARY OF ARGUMENT

ARGUMENT

I. Our Judicial System and This Court's Jurisprudence Are Based on Adherence to the Constitutional Requirement that Federal Courts May Only Entertain Actual Cases and Controversies.

A. The mootness doctrine is necessary to ensure that an actual case or controversy exists at all stages of the litigation.

Chafin v. Chafin,

Flast v. Cohen

Spokeo, Inc. v. Robins,

Id.

Id.

Id.

Lujan v. Defs. of Wildlife

See

Castro v. United States

Ashcroft v. Mattis

Id; see also *Diamond v. Charles*

Farrar v. Hobby

Id.

Id.

Id.

Id.

Id.

Id.

Farrar

Id.

Id.

Id.

Farrar

Farrar

Farrar

Callahan

Cf. Pearson v.

*Senators Urge Addition of Judgeships as Caseloads
Balloon*

*Key
Senators Want to Add New Federal Judgeships This
Year*

*Civil Rights Suits Against Schools
More Than Double in*

D. A rule that nominal damages alone prevent mootness allows an end run around the Court's rejection of the "catalyst theory."

Buckhannon

Buckhannon

Id.

Buckhannon

Buckhannon

encourages

**II. Federalism Supports Adoption of the
Decision Below.**

Co. City of Richmond v. J.A. Croson

Frederick,

See, e.g. Morse v.

Id

Am. v. Cuomo *See, e.g. Agudath Israel of*
Newsom *Harvest Rock Church, Inc. v.*

Chapel Dayton Valley v. Sisolak *Calvary*

*Hunt Cty.
Randall*

*See generally Robinson v.
Davison v.*

See Bogan v. Scott-Harris

Pearson

v. Ohio

See Beck

Monell

See Oklahoma City v.

Tuttle

Buckhannon

**IV. A Desire for Additional Law Does Not
Justify Disregarding Mootness.**

Id.

Saucier

id.

Id.

Saucier
