

THE SUPREME COURT OF THE STATE OF WASHINGTON

HEATHER ANDERSEN and LESLIE
CHRISTIAN, *et al.*,

Respondents,

v.

KING COUNTY, *et al.*,

Appellants.

CELIA CASTLE and BRENDA
BAUER, *et al.*,

Respondents,

v.

STATE OF WASHINGTON,

Appellant.

NO. 75934-1

**LABOR ORGANIZATIONS'
MOTION FOR LEAVE TO FILE
AN *AMICI CURIAE* BRIEF**

I. Identity of Moving Party and Relief Sought.

This motion for leave to file an *Amici Curiae* Brief in the above referenced case is brought by the following Labor Organizations: American Federation of Teachers, Washington; Asian Pacific American Labor Alliance, Seattle Chapter; Coalition of Labor Union Women, Puget Sound Chapter; Communication Workers of America, Local 7800; Inland Boatman's Union of the Pacific; International Alliance of Theatrical Stage Employees, Local 15; International Federation of Professional and

Technical Engineers, Local 17; International Union of Operating Engineers, Local 609; King County Labor Council; The Northwest Labor and Employment Law Office; Out Front Labor Coalition; Pride at Work; Seattle Community College Federation of Teachers, AFT 1789; Seattle Musicians' Association, Local 76-493; Service Employees International Union, Local 6; Service Employees International Union, Local 775; Service Employees International Union, Local 925; Service Employees International Union 1199NW; Service Employees International Union - Washington State Council; United Farm Workers, Pacific Northwest; United Auto Workers 4121; Washington Legal Workers; Washington State Nurses Association; and WashTech, CWA Local 37083.

II. Record Relevant to Motion.

Labor Organizations' *Amici Curiae* Brief and the Declaration of Kathleen Phair Barnard are filed contemporaneously with the Motion, and are incorporated by this reference.

III. Argument for Granting Motion.


This case is of particular interest to the labor organizations seeking to participate as *amici curiae* because they represent working women and men in the State of Washington and have experience with the ramifications of denial of marriage to gays and lesbians and with the denigration of those persons' humanity caused by discrimination against

them sanctioned by the State. These labor organizations have also experienced that internal democracy and external strength are the results of according all persons dignity and all families legitimacy. These perspectives and the legal argument presented by the labor organizations are complimentary to, but not duplicative of, the analysis given by the parties and should assist the Court in deciding this case, which is important to all Washingtonians.

IV. Conclusion.

Labor Organizations' Motion for Leave to File An *Amici Curiae* Memorandum should be granted.

DATED this 7 day of February, 2005.



Kathleen Phair Barnard, WSBA #17896
Schwerin Campbell Barnard LLP
18 West Mercer Street, Ste. 400
Seattle, WA 98119-3971
(206) 285-2828 Phone
(206) 378-4132 Fax
barnard@workerlaw.com
Attorneys for Labor Organizations