No. 24-704

IN THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

DEFENSE FOR CHILDREN INTERNATIONAL – PALESTINE; AL-HAQ; AHMED ABU ARTEMA; MOHAMMED AHMED ABU ROKBEH; MOHAMMAD HERZALLAH; AYMAN NIJIM; LAILA ELHADDAD; WAEIL ELBHASSI; BASIM ELKARRA; and DR. OMAR EL-NAJJAR,
Plaintiffs-Appellants,
v.
JOSEPH R. BIDEN, JR., *President of the United States*; ANTONY J. BLINKEN, *Secretary of State*; and LLOYD JAMES AUSTIN III, *Secretary of Defense*, in their official capacities,
Defendants-Appellees.
On Appeal from the United States District Court for the Northern District of California, Case No. 4:23-cv-05829-JSW

BRIEF OF AMICI CURIAE INTERNATIONAL HUMAN RIGHTS ORGANIZATIONS IN SUPPORT OF APPELLANTS' PETITION FOR REHEARING EN BANC

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Executive Materials

International Materials

Other Authorities

INTEREST OF *AMICI CURIAE* AND AUTHORITY TO FILE

Amici curiae, listed in the Appendix, are national and international human rights organizations, bar associations, and social justice movement lawyers from around the world with considerable collective expertise on the customary international law norms regarding genocide and an interest in upholding those norms. All parties to this appeal have consented to the filing of this brief. No party's counsel contributed to the drafting of this brief in whole or in part, and no party's counsel or third person contributed funds in preparing or submitting the brief.

Amici are deeply concerned about the erosion of norms protecting against the most heinous of crimes — genocide. The Israeli military attacks and humanitarian deprivations targeting Palestinians in Gaza for nearly one year, with the military and diplomatic support of the United States government, imbue this case with the potential of sparing numerous lives. *Amici* note thousands of additional deaths since filing our last brief. A case of this gravity merits a rehearing by the full Court to ensure careful consideration of the arguments before it.

SUMMARY OF ARGUMENT

International legal norms against genocide include a prohibition of complicity in its commission and a duty to prevent it. International courts and tribunals have found violations of these obligations justiciable. Yet, the

enforcement architecture of international law has long-depended first and foremost on domestic courts, only to be *supplemented* by international adjudicatory and enforcement mechanisms. Where, as here, the United States is alleged to have violated its international law obligations, international law views U.S. courts as the primary forum available to seek enforceable redress for the alleged violations. Failure to hold the United States accountable would contribute to the unacceptable erosion of international legal norms.

I. The Prohibition of Genocide is a Peremptory Norm that No State May Violate

The Genocide Convention codifies the *jus cogens* or peremptory norm prohibiting genocide. Convention on Prevention and Punishment of Crime of Genocide, Dec. 9, 1948, S. Exec. Doc. O, 81-1 (1949), 78 U.N.T.S. 277; *See*, *e.g.*, Application of Convention on Prevention and Punishment of Crime of Genocide *(Bosn. & Herz. v. Serb. & Montenegro)*, Judgment, 2007 I.C.J. 43, 111, ¶ 161 (Feb. 26). No circumstances — not even the existence of an armed conflict — can preclude the wrongfulness of violating peremptory norms. *See* International Law Commission, *Draft Articles on Responsibility of States for Internationally Wrongful Acts with Commentaries*, 84-85, U.N. Doc. A/56/10, Supp. No. 10 (Nov. 2001) [hereinafter ILC Articles on State Responsibility] (Article 26); Application of Convention on Prevention and Punishment of Crime of Genocide *(Gam. v. Myan.)*, Order on Request for Indication of Provisional Measures, 2020 I.C.J. 3,

27, ¶ 74 (Jan. 23); *Prosecutor v. Thaçi et al.*, Case No. KSC-BC-2020-06/F01536, Decision on Defence Motion for Judicial Notice of Adjudicated Facts with Annex I, ¶ 24 n. 52 (Kosovo Specialist Chambers May 18, 2023). As such, the political question doctrine must not apply in cases where plausible genocide is at issue; alleged actions in contravention of *jus cogens* obligations under the Genocide Convention simply cannot be treated as discretionary policy choices. Starkly put, when it comes to genocide there can be no discretion.

The Genocide Convention prohibits certain enumerated acts that are "committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group, as such." Genocide Convention, art. II, including acts such as forcible transfer "conducted in such a way that the group can no longer reconstitute itself", among others. *Prosecutor v. Blagojević & Jokić*, Case No. IT-02-60-T, Trial Judgement, ¶ 666 (Int'l Crim. Trib. for the former Yugoslavia Jan. 17, 2005).

In this vein, on January 26 2024, the International Court of Justice issued provisional measures addressing South Africa's claims that Israel's conduct in Gaza constitutes genocide of the Palestinian people. *See generally* Application of Convention on Prevention and Punishment of Crime of Genocide *(S. Afr. v. Isr.)*, Order on Request for Indication of Provisional Measures (Jan. 26, 2024).

II. The Justiciability of the United States' Duties to Prevent and Not be Complicit in Genocide

As a peremptory norm, the norm prohibiting genocide imposes binding obligations not only on the State perpetrating the genocide, but also on all States in the international community — to prevent genocide and avoid complicity in its commission. *See* Genocide Convention, art. IX; *Bosn. & Herz.*, 2007 I.C.J. at 111, ¶ 162; *id.* at 114 ¶ 167. The text of the Genocide Convention, characterizes genocide and complicity in its commission as a crime and commits States to "undertake to prevent" its commission.

A. Duty to Prevent Genocide

States' duty to prevent genocide is an "overriding legal imperative" that arises not only after the genocide "begins," but also — "since the whole point of the obligation is to prevent, or attempt to prevent, the occurrence of the act" — "at the instant that the State learns of, *or should normally have learned of*, the existence of a *serious risk* that genocide will be committed." *Bosn. & Herz.*, 2007 I.C.J. at 111-13, ¶¶ 162-65; *id.* at 220-22, ¶ 427; *id.* (Joint Declaration of Judges Shi and Koroma) at 282, ¶ 5. *See also* Declaration of Intervention Under Article 63 of Statute Submitted by the United States of America, Allegations of Genocide under Convention on Prevention and Punishment of Crimes of Genocide *(Ukr. v. Russ.)*, I.C.J., at ¶ 22 (Sept. 7, 2022).

This duty to prevent is "one of conduct and not one of result," or in other words, a duty of due diligence, in that "the obligation of States parties is [ ] to

employ all means reasonably available to them, so as to prevent genocide so far as possible." *Id.* at 221, ¶ 430. Determining the level of a State's responsibility to prevent genocide depends on its "capacity to influence effectively the action of persons likely to commit, or already committing, genocide," which in turn depends on, for example, "the strength of the political links, as well as links of all other kinds, between the authorities of that State and the main actors in the events." *Id.* at 221, ¶ 430.

B. Complicity in Genocide

Under customary international law governing both State Responsibility and individual criminal liability, the requisite *mens rea* for complicity in genocide via aiding and abetting is knowledge of the perpetrator's genocidal intent, rather than shared genocidal intent. *See* ILC Articles on State Responsibility, at 65 (Article 16) (State Responsibility); *Prosecutor v. E. Ntakirutimana & G. Ntakirutimana*, Cases Nos. ICTR-96-10-A & ICTR-96-17-A, Appeal Judgement, ¶¶ 500-501 (Int'l Crim. Trib. for Rwanda Dec. 13, 2004) (individual criminal liability). Awareness that crimes of genocide "would probably be committed, and one of these crimes is in fact committed" is sufficient to establish an individual's "knowledge." *Karadžić*, ¶ 577.

The *actus reus* for complicity by aiding and abetting requires "acts or omissions specifically directed to assist, encourage or lend moral support to the

perpetration of a certain specific crime," which "have a substantial effect upon the perpetration of the crime," a "fact-based inquiry." *Karadžić*, ¶ 575-576 (internal quotations omitted). *Accord* ILC Articles on State Responsibility, at 66, ¶ 5. Such conduct may include "practical assistance, encouragement, or moral support," *Prosecutor v. Furundzija*, Case No. IT-95-17/1-T, Trial Judgment, ¶ 249 (Int'l Crim. Trib. for the former Yugoslavia Dec. 10, 1998)

Despite the clarity of these duties to prevent and not be complicit in the commission of genocide, and other courts' rulings that Israel is plausibly committing genocide, the United States continues an uninterrupted flow of an exceptionally high amount of military aid to Israel. David Gritten, *Gaza war: Where does Israel get its weapons?* , BBC News (Sep. 3, 2024). The Biden Administration has acknowledged that it is reasonably likely that Israel has used U.S.-supplied arms to commit violations of international law, and reports detail several instances in which Israel has used these arms in likely war crimes. Stephen Semler, *Gaza Breakdown: 20 Times Israel Used US Arms in Likely War Crimes*, Quincy Institute for Responsible Statecraft (Aug. 26, 2024).

III. Domestic Courts' Integral Role in the Enforcement of the Prohibition of Genocide

The above-mentioned standards for the prohibition of genocide and complicity in its commission as well as the corresponding duty to prevent genocide

can only serve as meaningful restraints on State conduct if they are enforced. Given the United States' efforts to block all available avenues for international forums to enforce the prohibition of this "crime of crimes," federal courts of the United States remain as the sole viable venue for its enforcement.[1]

Domestic courts have long been considered the primary enforcement mechanism of international law, with international forums serving as mechanisms of "last resort." Karen C. Sokol, *Bringing Courts into Global Governance in a Climate-Disrupted World Order*, 108 Minn. L. Rev. 163, 177 (2023). In the "decentralized international legal system," individual States are the "final arbiter of legality" since they "interpret and apply" international norms "in the first instance." Antonios Tzanakopoulos, *Domestic Courts in International Law: The International Judicial Function of National Courts*, 34 Loy. L.A. Int'l & Comp. L. Rev. 133, 150 (2011). In States with a strong rule of law, domestic *courts* in particular play a critical function in assessing the legality of their State's conduct. *See* Oona A. Hathaway, *Between Power and Principle: An Integrated Theory of International Law*, 72 U. Chi. L. Rev. 469, 514 (2005). International law therefore "assigns to domestic courts a position more important to that of the Executive or

[1] While another State's courts could theoretically exercise universal jurisdiction over U.S. nationals alleged to have committed international crimes such as genocide, the United States — through its posture vis-à-vis international tribunal described below — has shown that it would prefer the scrutiny of its conduct by its own courts.

the Legislature in the implementation of the State's international obligations," since courts serve as "the last opportunity for the State to comply with its international obligations" before a violation is escalated to international forums. Tzanakopoulos, at 152. *See also id.* at 152-53 (citing as examples, the requirement for "exhaustion of local remedies" in the area of international criminal law and, to varying extents, international human rights law, international economic law, and international investment law); Christopher A. Whytock, From International Law and International Relations to Law and World Politics, in *Oxford Research Encyclopedia of Politics* 1, 12 (2018) (explaining how domestic courts "contribute to enforcement by applying international law, finding conduct in violation of international law, then ordering compliance or requesting enforcement measures by other bodies").

With domestic courts playing a lead role, international institutions have a subsidiary and complementary role in enforcement. *Id.* at 152. Such institutions include the principal U.N. organs charged with adjudicating and enforcing peremptory norms of international law: the International Court of Justice, the International Criminal Court, and the United Nations Security Council. As "the principal judicial organ of the United Nations," the International Court of Justice is empowered to settle disputes between States based on breaches of treaty law or customary international law. U.N. Charter, art. 92. States accept jurisdiction of the

Court through a particular treaty, or by accepting the Court's compulsory jurisdiction over legal disputes concerning breaches of customary international law. *See* Statute of the International Court of Justice, art. 36(1), (2), June 26, 1945, 3 Bevans 1179, 59 Stat. 1055, T.S. No. 993; A Case Concerning Military and Paramilitary Activities in and against Nicaragua *(Nicar. v. U.S.)*, Merits, Judgment, 1986 I.C.J. 14, 97, ¶ 182 (June 27). When a State fails to comply with an order of the ICJ, a party has recourse to the Security Council for enforcement of the ruling. U.N. Charter, art. 94(2). The ICC, by contrast, has jurisdiction over *individuals* "for the most serious crimes of international concern," including genocide, but only as "complementary to national criminal jurisdictions." Rome Statute of the International Criminal Court, art. 1, U.N. Doc. A/CONF.183/9 (July 17, 1998). Like the ICJ, the Security Council plays a significant role in ICC proceedings, in particular in referrals to the Prosecutor and, when such a referral takes place, in ensuring cooperation with the Court. *Id.* at art. 13(b); 87(7). And finally, as evidenced by its role in the enforcement of ICJ rulings and the operation of the ICC, the Security Council is a central enforcement mechanism of international law. It is the institution with the sole authority to issue binding resolutions on members of the United Nations. *See* U.N. Charter, art. 25. However, its powers are limited by the veto authority of the five permanent members of the Security Council, which include the United States. *See* U.N. Charter, arts. 23(1); 27(3).

The United States has rendered impossible any assessment of its conduct in violation of peremptory norms of customary international law or the Genocide Convention in any of these international forums. First, the United States refused to accept the International Court of Justice's jurisdiction over violations of the Genocide Convention without its consent, *see* Genocide Convention, Reservation of the United States, and has done the same for violations of customary international law. In the 1980s, in response to the ICJ's exercise of jurisdiction over Nicaragua's claims that the United States had unlawfully used force and ultimately ruling against the United States, the United States withdrew from the ICJ's compulsory jurisdiction over customary international law violations. *See* Cong. Res. Serv., *The United States and the "World Court"* (2018). The United States has also often rejected the jurisdiction of the International Criminal Court. *See*, *e.g.*, Antony J. Blinken, Secretary of State, Press Statement: Ending Sanctions and Visa Restrictions against Personnel of the International Criminal Court (Apr. 2, 2021). Closing off the availability of these judicial venues, the United States further exercises its veto power in the Security Council to obstruct enforcement of rulings by these bodies. The United States twice prevented the Security Council from enforcing the *Nicaragua* ruling. *See* U.N. SCOR, 2704th mtg. at 54-55, U.N.

Doc. S/PV.2704 (July 31, 1986); U.N. SCOR, 2718th mtg. at 51, U.N. Doc. S/PV.2718 (Oct. 28, 1986).[2]

The United States has made statements making plain that it would exercise its veto power to prevent enforcement of any ICJ rulings on this question. *See* White House, *Press Briefing by Press Secretary Karine Jean-Pierre and NSC Coordinator for Strategic Communications John Kirby* (Jan. 3, 2024); White House, *Press Briefing by Press Secretary Karine Jean-Pierre, NSC Coordinator for Strategic Communications John Kirby, and National Climate Advisor* (Jan. 26, 2024).

Accordingly, the only remaining forums to enforce the United States' compliance with the norm prohibiting complicity in genocide are institutions of the United States itself, namely the federal judiciary. If this Court were to decline a rehearing, it would result in foreclosing all judicial avenues to enforce this most fundamental of norms against the United States. This would be untenable and undermine the operation of the international legal system.

Indeed, at least one foreign court has allowed a case challenging its State's complicity in Israel's conduct in Gaza to proceed. On February 12, 2024, following

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[2] The United States' veto was the first-ever veto of a Security Council resolution to enforce an ICJ ruling and arguably in violation of the U.N. Charter. *See* Keith Highet, *Between a Rock and a Hard Place - The United States, the International Court, and the Nicaragua Case*, 21 Int'l L. 1083, 1093 (1987).

the ICJ's ruling that Israel's acts and omissions may plausibly constitute genocide, a Dutch appeals court blocked further exports of United States-made F-35 fighter jet parts stockpiled in The Netherlands and destined for Israel because of its concern that such exports were contributing to furthering violations of international law. Notably, the appeals court reversed a lower court's ruling that it had no jurisdiction to weigh in on policy decisions of the government on the basis that policy decisions cannot override the risk of committing violations of international law. Stephanie van den Berg, *Dutch court orders halt to export of F-35 jet parts to Israel*, Reuters (Feb. 12, 2024). A similar logic applies in the present case: the United States government cannot make a policy decision to violate a *jus cogens* norm of international law, and this Court should exercise judicial review as the only available and meaningful forum for accountability of such violations.

IV. The United States' Contribution to the Erosion of Long- and Widely-Held Peremptory Norms of International Law

Seventy-five years ago, the United States acted as a drafter of both the Genocide Convention and the Universal Declaration of Human Rights and assumed a key role on the U.N. Security Council to ensure that a rule of law would protect humanity from the worst atrocities committed prior to and during World War II, including genocide. The United States' singularly impactful role in shaping and enforcing international law — in part due to its veto power in the U.N. Security Council — gives it an outsized influence on how legal standards are

applied. Accordingly, a failure to remedy the United States' breaches of its duties to prevent and not be complicit in genocide substantially increases the risk of degrading the rule of law and emboldening the commission of grave atrocities globally.

Examples demonstrating how the United States' actions can contribute to the erosion of peremptory norms include its use of force in its 2003 invasion of Iraq and conduct in its prosecution of the "War on Terror," which has led to a global proliferation of State misuse of the counterterrorism framework for political ends. These examples show how failure to immediately redress breaches of fundamental human rights norms not only increases the danger to communities at risk of being targeted for human rights abuses in the short term, but may also result in unanticipated consequences that undermine international peace and security, and the United States' own interests, in the long term.

A. Erosion of Peremptory Norms Governing States' Use of Force

Despite a clear legal framework prohibiting the use of force unless it is either expressly authorized by the U.N. Security Council or meets the strict requirements of self-defense against imminent attack, *see* U.N. Charter, arts. 2(4), 42, 51, the United States bypassed the U.N. Security Council process for authorization of the use of force prior to its 2003 invasion of Iraq. Instead, the United States invoked past U.N. Security Council Resolutions 687 and 1441 that

did not authorize the use of force for the stated purposes of disarming Iraq of its alleged weapons of mass destruction. *See* Permanent Rep. of the U.S. to the U.N., *Letter dated 20 March 2003 from Permanent Representative of the United States of America to the UN addressed to President of the Security Council*, U.N. Doc. S/2003/351 (Mar. 21, 2003); S.C. Res. 687 (Apr. 3, 1991); S.C. Res. 1441 (Nov. 8, 2002); Sean D. Murphy, *Assessing the Legality of Invading Iraq*, 92 Geo. L.J. 173, 179-229 (2004). It further advanced a novel notion of "preemptive self-defense" as justification for the invasion. *See* President George W. Bush, The National Security Strategy of the United States of America (Sept. 2002). Declaring the United States' military action "illegal," then-U.N. Secretary General Kofi Annan warned that the notion of "preemptive self-defense" could lead to a breakdown of the international order. *See* Ewen MacAskill & Julian Borger, *Iraq war was illegal and breached UN charter, says Annan*, The Guardian (Sept. 15, 2004).

Nearly twenty years later, Russia's invocation of the United States' past conduct shows how the United States' prior failure to follow international norms has in fact facilitated similar behavior by other States that threatens international peace and security. Namely, Russia expressly invoked the United States' justifications of its 2003 invasion of Iraq to claim that its 2022 invasion of Ukraine was an act of preemptive self-defense against the threat of NATO expansion — a claim that, like the United States' justification for invading Iraq, did not meet the

requirement that the use of force in self-defense only be deployed against attacks that are occurring or imminent. *See* Permanent Rep. of Russ. to the U.N., *Letter dated 24 February 2022 from the Permanent Representative of the Russian Federation to the United Nations addressed to the Secretary-General*, U.N. Doc. S/2022/154 (Feb. 24, 2022); *see also id.* at Annex, p. 3 (referring to the "lack of any legal basis" for the United States' 2003 invasion of Iraq). The result has been disastrous: Russia's 2022 invasion of Ukraine has resulted in the deaths of over 11,500 civilians and presents an ongoing threat to international peace and security. U.N. Human Rights Office of the High Comm'r, *Ukraine: Protection of Civilians in Armed Conflict, July 2024 Update*, (Aug. 9, 2024).

B. Erosion of Peremptory Norms Governing Conduct in Armed Conflicts

In the aftermath of the September 11, 2001 attacks, the United States spearheaded a global "War on Terror" that utilized counter-terrorism tactics that undermined norms governing armed conflict, including peremptory norms, and catalyzed the establishment of a global counter-terrorism framework. As a result, long-established legal norms — including the prohibitions against arbitrary detention, torture, and extrajudicial killings — have been materially degraded.

For example, the United States asserted that a *sui generis* legal regime must govern its conflict with Al Qaeda to justify its indefinite definition of detainees in the Guantánamo Bay detention camp. *See* Brief for Respondents at *37-40, 48-49,

Hamdan v. Rumsfeld, 548 U.S. 557 (2006) (No. 05-184), 2006 WL 460875. The Supreme Court squarely rejected this argument, holding that the minimum international legal protections afforded to those detained during an armed conflict must apply. *See Hamdan v. Rumsfeld*, 548 U.S. 557, 629-31 (2006). Despite this ruling, however, U.N. experts have decried Guantánamo as "a site of unparalleled notoriety, defined by the systematic use of torture, and other cruel, inhuman or degrading treatment against hundreds of men brought to the site and deprived of their most fundamental rights." U.N. Human Rights Office of the High Comm'r Press Release, *Guantanamo Bay: "Ugly chapter of unrelenting human rights violations" – UN experts* (Jan. 10, 2022). Consequently, these experts have also expressed concern that "[w]hen a State fails to hold accountable those who have authorized and practised torture and other cruel inhuman or degrading treatment it sends a signal of complacency and acquiescence to the world." *Id.*

Successive U.N. human rights experts on counter-terrorism since the start of the United States-led "War on Terror" have also raised alarms about States' rampant misuse of counterterrorism measures to target specific groups and silence human rights defenders around the world. A global study on the impact of counter-terrorism measures on civil society and civic space revealed that "misuse is often discriminatory, directed against religious, ethnic and cultural minorities, women, girls and LGBT and gender-diverse persons, indigenous communities, and other

historically discriminated against groups in society." *See* Fionnuala Ní Aoláin, *Report of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism*, at 2, U.N. Doc. A/78/520 (Oct. 10, 2023). The resulting "playbook of misuse" has included such serious human rights violations as judicial harassment, forced disappearances and arbitrary detentions, "misuse and misapplication" of "terrorist" designations and sanctions, and surveillance and targeting the financing of civil society groups, all under the guise of countering terrorism. *Id*. at 4.

Crackdowns on specific ethnic groups in the name of the "War on Terror," including mass detentions and other abuses of the Uyghurs in the Xinjiang province by China, *see* Phelim Kine, *How China hijacked the war on terror*, Politico (Sept. 9, 2021), and what are considered to have been acts of genocide by the Myanmar military against Rohingya Muslims, *see* U.N. Human Rights Office of the High Commissioner Press Release, *Myanmar: UN Fact-Finding Mission releases its full account of massive violations by military in Rakhine, Kachin and Shan States* (Sept. 18, 2018), demonstrate how specific groups are at heightened risk of human rights abuses when international norms erode.

Another example draws from the United States' covert program of extraterritorial targeted killings of its own citizens and foreign nationals. *See*, *e.g.*, Philip Alston, *The CIA and Targeted Killings Beyond Borders*, 2 Harv. Nat'l Sec.

J. 283, 284 (2011). These targeted killings have contravened both domestic law and the United States' international legal obligations. *Id*. These have emboldened similar violations by other States. For example, India's counter-terrorism tactics included ordering the extraterritorial targeted killing of a Canadian citizen in Canada and a United States citizen in New York. *See*, *e.g*., Ellen Nakashima et al., *U.S. prosecutors allege assassination plot of Sikh separatist directed by Indian government employee*, Wash. Post (Nov. 29, 2023). This tactic has been justified in India by invoking the United States' "War on Terror" targeted killings program. *See*, *e.g*., Murtaza Hussain, *Indian Nationalists Cite Inspiration for Foreign Assassinations: U.S. "Targeted Killing" Spree*, The Intercept (Oct. 5, 2023).

CONCLUSION

The gravity of what is at stake here cannot be overstated. There is no political question that can prevent this Court from exercising, courageously, its role in enforcing customary international law – as a part of federal common law – prohibiting complicity in genocide. Additionally, the need to curtail the ongoing horror unfolding in Gaza and the importance of respecting fundamental norms of international law all compel this Court to grant a rehearing in this case. Plaintiffs' claims against the United States are justiciable, and federal courts are the only available forums to meaningfully enforce the United States' compliance with the norm prohibiting genocide.

Dated: September 9, 2024

Respectfully submitted,

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APPENDIX

Amici International Human Rights Organizations

1. Academics for Palestine, Ireland
2. African Bar Association (AfBA), Africa
3. Alternative Information and Development Centre, South Africa
4. ALTSEAN-Burma, Burma
5. American Association of Jurists/Asociación Americana de Juristas, The Americas
6. Aprodeh-Peru, Peru
7. Arab Lawyers' Association, United Kingdom
8. Arab Lawyers' Union, Global
9. Asociación Libre de la Abogacía, Spain
10. Associação Portuguesa de Juristas Democratas, Portugal
11. Association Démocratique des Femmes du Maroc, Morocco
12. Association Marocaine des Droits Humains, Morocco
13. Atlanta Jericho, United States
14. Australian Centre for International Justice, Australia
15. Ayuda Legal Puerto Rico, Puerto Rico
16. Bahrain Center for Human Rights, Kingdom of Bahrain

17. Bahrain Human Rights Society (BHRS), Bahrain
18. BDS Australia, Australia
19. Beyond Borders Malaysia, Malaysia
20. Black Alliance for Peace, United States of America
21. Bridge Community Café, United States of America
22. Buffalo Human Rights Center, United States of America
23. Cabinet Maître Abderrahim Jamaï, Morocco
24. Çağdaş Hukukçular Derneği - Progressive Lawyers' Association, Turkey
25. Cairo Institute for Human Rights Studies (CIHRS), Tunisia
26. Canadians for Justice and Peace in the Middle East (CJPME), Canada
27. Cátedra UNESCO de Desarrollo Humano Sostenible (Universidad de Girona), Spain
28. Center for Egyptian Women's Legal Assistance (CEWLA), Egypt
29. Centre Delàs d'Estudis per la Pau, Spain (Catalonia)
30. Centre for Human Rights and Development (CHRD), Mongolia
31. Centre for Palestine Studies, SOAS, Palestine
32. Centro de Asesoría y Estudios Sociales (CAES), Spain
33. Centro de Estudios Legales y Sociales (CELS), Argentina
34. Centro di Ricerca ed Elaborazione per la Democrazia, Italy
35. Centro Popular de Direitos Humanos (CPDH), Brazil

36. Climate Craic CIC, Northern Ireland

37. Climate Justice for Palestine Belfast, Northern Ireland

38. Confederation of Lawyers of Asia and the Pacific (COLAP), Asia/Pacific

39. Coletivo Minha Voz Liberta, Brazil

40. Community Justice Project, United States of America

41. Community Resource Centre, Thailand

42. Consejo de Pueblos Wuxhtaj, Guatemala

43. CooperAccio, Spain

44. Coordinación Colombia Europa Estados Unidos, Colombia

45. Corporación Colectivo de Abogados "José Alvear Restrepo" (CAJAR), Colombia

46. Corporación Colectivo de Objetores y Objetoras por Conciencia: Quinto Mandamiento, Colombia

47. Detroit Jericho Movement, United States of America

48. Dibeen Association for Environmental Development, Jordan

49. DITSHWANELO - The Botswana Centre for Human Rights, Botswana

50. Desis Rising Up & Moving (DRUM), United States of America

51. Egyptian Initiative for Personal Rights (EIPR), Egypt

52. Elseidi Law Firm, Egypt

53. Equal Education, South Africa

54. European Center for Palestine Studies, University of Exeter, United Kingdom

55. European Legal Support Center (ELSC), The Netherlands

56. FAIR Law Firm, Indonesia

57. FairSquare, United Kingdom

58. Falana and Falana's Chambers, Nigeria

59. Forum Tunisien pour les Droits Economiques et Sociaux, Tunisia

60. Friedman, Gilbert + Gerhardstein, LLC (FG+G), United States of America

61. Fundación Enlace Social, Colombia

62. Giniw Collective, United States of America

63. Giuristi Democratici, Italy

64. Haldane Society of Socialist Lawyers, United Kingdom

65. ILGA Asia, Thailand

66. Indian Association of Lawyers, India

67. Institut de Drets Humans de Catalunya, Spain

68. Institut Novact de Noviolència, Spain

69. Instituto de Estudios Legales y Sociales del Uruguay, Uruguay

70. International Association of Democratic Lawyers, Global

71. International Centre for Ethnic Studies, Sri Lanka

72. International Peace Research Association, Global

73. Ireland-Palestine Solidarity Campaign, Ireland

74. Irídia - Center for the Defence of Human Rights, Spain

75. Japan Lawyers International Solidarity Association (JALISA), Japan

76. Kashmir Law and Justice Project, Kashmir

77. LABÁ - Direito, Espaço & Política, Brazil

78. La Ligue Algérienne pour la Défense des Droits de l'Homme (LADDH), Algeria

79. League for the Defence of Human Rights in Iran (LDDHI), Iran, France

80. Legal Centre Lesvos, Greece

81. Malcolm X Center for Self Determination, United States of America

82. Manushya Foundation, Thailand

83. Mass Incarceration Committee-National Lawyers Guild, United States of America

84. Minha Voz Liberta, Brazil

85. Minority Rights Group International, United Kingdom, Uganda, Hungary, Belgium

86. Mississippians for Palestine, United States of America

87. Monique and Roland Weyl People's Academy of International Law, Global

88. Movement for Black Lives, United States of America

89. Movement Law Lab/Global Network of Movement Lawyers, United States of America, Global

90. Mwatana for Human Rights, Yemen

91. National Association of Democratic Lawyers (NADEL), South Africa

92. National Conference of Black Lawyers, United States of America

93. National Jericho Movement, United States of America

94. National Lawyers Guild (NLG), United States of America

95. National Lawyers Guild - Louisiana Chapter, United States of America

96. National Lawyers Guild-San Francisco Bay Area chapter/NLG Task Force on the Americas, United States of America

97. National Union of Peoples' Lawyers, Philippines

98. Ndifuna Ukwazi, South Africa

99. New Abolitionist Movement, United States of America

100. New York City Jericho Movement, United States of America

101. International Campaign to Free Kamau Sadiki, United States of America

102. Oakland Jericho, United States of America

103. Observatori DESCA, Spain

104. Palestine Solidarity Campaign, South Africa

105. Palestinian American Bar Association, United States of America

106. Palestinian Bar Association, Palestine

107. Palestinian Centre for Human Rights, Palestine

108. Plenaria Memoria y Justicia, Uruguay

109. President Arab Lawyers Association, United Kingdom

110. ProDESC (Proyecto de Derechos Económicos, Sociales y Culturales), México

111. Project for Middle East Democracy, United States of America

112. Project South, United States of America

113. Pusat Bantuan Hukum Peradi Makassar, Indonesia

114. Rachel Corrie Foundation for Peace and Justice, United States of America

115. Rising Majority, United States of America

116. Rohingya Maìyafuìnor Collaborative Network, Canada - Global

117. Rural Women's Assembly, South Africa

118. SAGRC, South Africa

119. Salt River Heritage Society, South Africa

120. San Francisco Bay View National Black Newspaper, United States of America

121. SECTION27, South Africa

122. Showing Up for Racial Justice, Santa Cruz County, CA, United States of

America

123. Sinai Foundation for Human Rights, United Kingdom

124. Socialist Lawyers Association of Ireland, Ireland

125. Socio-economic Rights Institute of South Africa (SERI), South Africa

126. South African Jews for a Free Palestine, South Africa

127. Spirit of Mandela Coalition, United States of America

128. Studio Fallout, United States of America

129. Syrian Center for Media and Freedom of Expression-SCM, Syria

130. Temblores ONG, Colombia

131. Terra de Direitos, Brazil

132. The Center of Research and Elaboration on Democracy (CRED), Italy

133. The Palestine Institute for Public Diplomacy (PIPD), Palestine

134. The Palestinian Human Rights Organization PHRO, Palestine

135. Upstate Voices for Palestine, United States of America

136. Vamos PR, Puerto Rico

137. Visualizing Palestine, Canada-United States of America

138. Women's Legal Centre, South Africa

139. Yayasan Lembaga Bantuan Hukum Indonesia - YLBHI (Indonesia Legal Aid Foundation), Indonesia

140. Zabalaza Pathways Institute, South Africa

141. Zero Waste JXN, United States of America

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

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