

No. 75934-1

SUPREME COURT OF THE STATE OF WASHINGTON

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

v.

KING COUNTY, et al., Appellants,

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Appeal from the Superior Court of King County  
The Honorable William L. Downing

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CELIA CASTLE and BRENDA BAUER et al., Respondents,

v.

STATE OF WASHINGTON, Appellant,

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Appeal from the Superior Court of Thurston County  
The Honorable Richard D. Hicks

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**MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF  
ON BEHALF OF MULTIFAITH WORKS,  
COALITION FOR RELIGIOUS EQUALITY,  
AND WASHINGTON FAITH COMMUNITIES**

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David Donnan, WSBA #19271  
1511 Third Avenue, #701  
Seattle, WA 98101  
(206) 587-2711

Vanessa Soriano Power, WSBA  
#30777  
STOEL RIVES LLP  
600 University Street, #3600  
Seattle, WA 98101  
(206) 624-0900

Attorneys for Multifaith Works, Religious Coalition for Equality,  
and Washington Faith Communities

## I. IDENTITY & INTEREST OF MOVING PARTIES

*Amici curiae* include a wide variety of religious faiths, traditions, and other religious organizations throughout the State of Washington. *Amici* include: Multifaith Works, the organizer of the Multifaith Alliance of Reconciling Communities, the Religious Coalition for Equality, and numerous individual congregations from across the state. See Appendix A for *amici* Statements of Interest.

Multifaith Works is an inter-faith, not-for-profit organization which works to build a “community of compassion” across lines of religion and spirituality, particularly in service of people living with AIDS. One program within Multifaith Works is the Multifaith Alliance of Reconciling Congregations (MARC) which endeavors to educate and support clergy and laypeople from multiple traditions regarding human dignity and sexuality, particularly with respect to homophobia and religious intolerance of homosexual people. Multifaith Works seeks to support the dignity and equal rights of all people, include the right of same-gender couples to marry. See Appendix A pp. 1-2.

The Religious Coalition for Equality is an interfaith association of lay person and clergy committed to a twofold purpose: to educate Washington State citizens about and advocate for marriage equality for all

couples and the civil rights of all. Under the auspices of the Religious Coalition for Equality, 227 individual religious leaders from around the state have joined in signing a “Statement of Faith-Based Support for Same-Sex Marriage.” See Appendix A p. 3; Appendix B.

*Amici* also include the following congregations from across the State of Washington:

- All Pilgrims Christian Church, United Church of Christ and Disciples of Christ;
- Seattle First Baptist Church;
- Bet Alef Meditative Synagogue of Bellevue;
- Temple Beth Am;
- Bethany United Church of Christ;
- Temple Beth Or;
- Broadview Community United Church of Christ;
- Central Lutheran Church of the Holy Trinity;
- Community Church of Joy;
- Olympia Friends Meeting;
- Olympia Unitarian Universalist Congregation;
- Pullman-Moscow Friends Meeting;
- Tacoma Friends Monthly Meeting;
- Rainbow Cathedral Metropolitan Community Church;
- University Friends Meeting;

- Walla Walla Friends Meeting;
- Wallingford United Methodist Church; and
- West Seattle Unitarian Universalist Fellowship.

See Appendix A pp. 4 – 21.

*Amici* support the right of all committed couples to marry, regardless of gender. *Amici* recognize the fundamental distinction between civil marriage, sanctioned by the state, and the religious rites of matrimony, governed by an individual faith's practice. *Amici* believe that the constitutional protections of equal protection and the free exercise of religion require equal rights of access, without regard to gender or sexual orientation, to civil marriage.

## **II. GROUNDS FOR RELIEF & ARGUMENT**

*Amici* are familiar with the issues and the scope of argument presented in filings before this Court. *Amici* are able to provide broader context for the Court's consideration of the views of various religious communities in its review of constitutional issues related to the right of all committed couples to marry and specific counterpoint to the express and implied arguments of Appellants/Intervenors.

### III. CONCLUSION

For all the foregoing reasons, *amici* should be granted leave to file an *amici curiae* brief. *Amici* respectfully request that this Court accept the accompanying *amici curiae* brief for consideration.

DATED this 7<sup>th</sup> day of February 2005.

STOEL RIVES LLP

By: David Donnan  
David Donnan, *by VSP*  
WSBA # 19271  
1511 Third Ave., #701  
Seattle, WA 98101  
(206) 587-2711

By: Vanessa Soriano Power  
Vanessa Soriano Power,  
WSBA #30777  
600 University St., #3600  
Seattle, WA 98121  
206-624-0900

