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TETON COUNTY, WYOMING

DEC 29 2022

CLERK OF DISTRICT COURT

Frederick J. Harrison #5-1586
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Attorneys for Proposed Intervenors Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming, Inc.

**Admitted Pro Hac Vice*

IN THE DISTRICT COURT OF THE NINTH JUDICIAL DISTRICT
IN AND FOR TETON COUNTY, WYOMING

DANIELLE JOHNSON; KATHLEEN)
DOW; GIAVANNINA ANTHONY, M.D.;)
RENE R. HINKLE, M.D., CHELSEA'S)
FUND; and CIRCLE OF HOPE)
HEALTHCARE d/b/a Wellspring Health)
Access;)
Plaintiffs,)

v.)

Case No. 18732

STATE OF WYOMING; MARK GORDON,)
Governor of Wyoming; BRIDGET HILL,)
Attorney General for the State of Wyoming;)
MATTHEW CARR, Sheriff Teton County,)
Wyoming; and MICHELE WEBER, Chief of)
Police, Town of Jackson, Wyoming,)
Defendants.)

PROPOSED INTERVENORS' NOTICE OF APPEAL OF ORDER DENYING
MOTION TO INTERVENE

TO THE CLERK OF THE ABOVE CAPTIONED DISTRICT COURT:

NOTICE IS HEREBY GIVEN that Proposed Intervenors Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming, Appellants, appeal the Order *Denying Motion to Intervene* entered herein on November 30, 2022.

I. The Parties Taking the Appeal.

The parties taking this appeal are Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming, Proposed Intervenors in civil action number 18732 in the District Court of the Ninth Judicial District in and for Teton County, Wyoming, which civil action is entitled as set forth above in the caption to this *Notice of Appeal*.

II. Identity of the Judgment and Appealable Order.

The judgment or appealable order in the above-captioned case of *Johnson v. State of Wyoming*, is identified by Proposed Intervenors (Appellants) Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming as that *Order Denying Motion to Intervene* dated and signed on November 30, 2022, by District Judge Melissa M. Owens in the above-entitled matter, and which *Order* was entered in the records herein on November 30, 2022. Said *Order* which is being appealed from is listed as **item A** to the *Appendix to Notice of Appeal* and said **item A** is by this reference made expressly a part hereof as though fully set forth herein.

III. Name of the Court to Which This Appeal is Taken.

The name of the Court to which this appeal of Proposed Intervenors (Appellants) Rodriguez-Williams, Neiman, and Right to Life of Wyoming is being taken is the Wyoming Supreme Court.

IV. Certificate of Endorsement Required by Wyoming Rule of Appellate Procedure 2.05.

Concurrently with the filing of this *Notice of Appeal*, Appellants by and through their attorney, Frederick J. Harrison Esq. hereby endorses his signature below upon this *Notice of Appeal* his certification that in accordance with Wyoming Rule of Appellate Procedure 2.05, he has made arrangements with the court reporter for a transcript of the hearing relevant to this appeal.

Appellants further hereby certify that all relevant portions of the transcript of evidence deemed necessary for this appeal have been ordered and proper arrangements for payment of the transcript have been made.

V. Appendix to this Notice of Appeal Pursuant to Wyoming Rule of Appellate Procedure 2.07(b).

Pursuant to W.R.A.P. 2.07(b)(1), attached to this *Notice of Appeal* and expressly made a part hereof is an *Appendix to Notice of Appeal* listing but not attaching all pleadings “. . .that assert a claim for relief whether by complaint, counterclaim or cross-claim and all pleadings adding parties. . .” These pleadings consist of the *Complaint* filed by Plaintiffs on July 25, 2022 as **item B** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is Proposed Intervenors’ *Motion to Intervene* filed on August 16, 2022, as **item C** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is State Defendants’ *Response to the Motion to Intervene*, filed on August 31, 2022, as **item D** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is Plaintiffs’ *Opposition to Individual Legislators’ and Right to Life of Wyoming’s Motion to Intervene*, filed on September

2, 2022, as **item E** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is Proposed Intervenors' *Reply in Support of the Motion to Intervene*, filed on October 7, 2022, as **item F** and by this reference made expressly part of this *Notice of Appeal*.

VI. Payment of Requisite Filing Fees in the District Court in the Wyoming Supreme Court.

After inquiry with the Clerk of the Supreme Court and the Clerk of the District Court, Proposed Intervenors/Appellants, by and through their attorney, submits to the Clerk of the District Court separate checks drawn on the account of the undersigned attorney, in the sums of \$140.00 made payable to the Clerk of the Wyoming Supreme Court and \$100.00 made payable to the Clerk of the District Court of Teton County, as filing fees for this appeal and in accordance with the individual court rules or orders as verified by the clerks of each court.

VII. Timeliness of This Notice of Appeal.

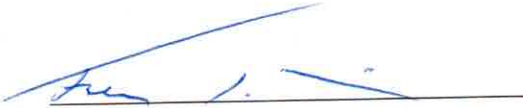
The *Order* was entered in the record of the trial court (District Court) according to the record herein on November 30, 2022.

W.R.A.P. 2.01(a) states: "An appeal from a trial court to an appellate court shall be taken by filing the notice of appeal with the clerk of the trial court within 30 days from entry of the appealable order. . ." W.R.A.P. 2.01(a).

VIII. Submission of this *Notice of Appeal* to the Wyoming Supreme Court.

Simultaneously with the filing of this *Notice of Appeal*, Proposed Intervenors/Appellants, by and through their undersigned counsel, are sending a copy of this *Notice of Appeal* to the Clerk of the Wyoming Supreme Court to give notice of this appeal pursuant to Wyoming Rule of Appellate Procedure 2.01(a).

Wherefore, Proposed Intervenors/Appellants Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming, by and through their undersigned counsel, do respectfully submit this *Notice of Appeal* this 29th day of December 2022.



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**APPENDIX TO NOTICE OF APPEAL LISTING BUT NOT ATTACHING
DOCUMENTS IN THE RECORD**

A

Order Denying Motion to Intervene, filed herein in Docket No. 18732 on November 30, 2022.

B

Complaint filed by Plaintiffs, filed herein in Docket No. 18732 on July 25, 2022.

C

Proposed Intervenors' *Motion to Intervene*, filed herein in Docket No. 18732 on August 16, 2022.

D

State Defendants' *Response to the Motion to Intervene*, filed herein in Docket No. 18732 on August 31, 2022.

E

Plaintiffs' *Opposition to Individual Legislators' and Right to Life of Wyoming's Motion to Intervene*, filed herein in Docket No. 18732 on September 2, 2022.

F

Proposed Intervenors' *Reply in Support of the Motion to Intervene*, filed herein in Docket No. 18732 on October 7, 2022.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of December 2022, a true and correct copy of the foregoing document was email filed with the Teton County District Court. It was also served upon the following person(s) in the following manner as indicated:

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