

Frederick J. Harrison #5-1586
FREDERICK J. HARRISON, P.C.
1813 Carey Avenue
Cheyenne, Wyoming 82001
307-324-6639

Denise M. Harle, GA Bar No. 176758*
ALLIANCE DEFENDING FREEDOM
1000 Hurricane Shoals Rd NE, Suite D-1100
Lawrenceville, GA 30043
(770) 339-0774
dharle@adflegal.org

Attorneys for Proposed Intervenors Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, Secretary of State Chuck Gray, and Right to Life of Wyoming, Inc.

**Pro hac vice application forthcoming*

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

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

Plaintiffs,)

Case No. 18853

v.)

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.)

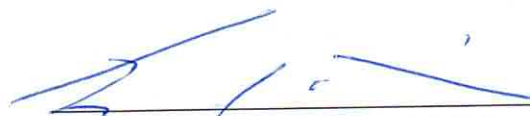
**WYOMING LEGISLATORS, WYOMING SECRETARY OF STATE, AND
RIGHT TO LIFE OF WYOMING'S MOTION TO INTERVENE**

COME NOW Proposed Intervenors—Individual Wyoming Legislators Representative Rachel Rodriguez-Williams and Representative Chip Neiman, Wyoming Secretary of State Chuck Gray, and Right to Life of Wyoming—by and through undersigned counsel, file this Motion to Intervene in the above-captioned matter. In support of their motion, Proposed Intervenors have filed contemporaneously a Memorandum in Support of Motion to Intervene. Additionally, pursuant to Wyoming Rule of Civil Procedure 24(c), Proposed Intervenors have filed contemporaneously a Proposed Answer to Plaintiffs’ Amended Complaint.

Proposed Intervenors seek intervention as of right, and alternatively, permissive intervention under Wyo. R. Civ. P. 24. Under that rule and the jurisprudence interpreting it, granting the Proposed Intervenors’ Motion to Intervene is both warranted and appropriate. Proposed Intervenors have filed this motion in a timely manner, and they have unique and significant protectable interests at stake in this action that no existing party is situated or willing to defend. As a result, they satisfy the requirements for intervention as of right. Further, because they share with the main action common questions of law and fact, and their intervention will result in no delay or prejudice, Proposed Intervenors also meet the requirements for permissive intervention.

Accordingly, the Proposed Intervenors respectfully request that this Court grant their Motion to Intervene.

RESPECTFULLY SUBMITTED this 6th day of April, 2023.



Frederick J. Harrison #5-1586
FREDERICK J. HARRISON, P.C.
1813 Carey Avenue
Cheyenne, Wyoming 82001
307-324-6639

Denise M. Harle, GA Bar No. 176758*
ALLIANCE DEFENDING FREEDOM
1000 Hurricane Shoals Rd NE, Suite
D-1100
Lawrenceville, GA 30043
(770) 339-0774
dharle@adflegal.org

*Attorneys for Proposed Intervenors
Rep. Rachel Rodriguez-Williams, Rep.
Chip Neiman, and Right to Life of
Wyoming*

**Pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April 2023, 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:

John H. Robinson
Marci C. Bramlet
Robinson Welch Bramlett, LLC
172 Center Street, Suite 202
PO Box 3139
john@lawrwb.com
marci@lawrwb.com

U.S. Mail
 Hand delivered
 Court Mailbox
 Email

Erin E. Weisman
Teton County Attorney's Office
P.O. Box 4068
Jackson, WY 83002
eweisman@tetoncountywy.gov


U.S. Mail
 Hand delivered
 Court Mailbox
 Email

Lea M. Colasuonno
Town of Jackson
P.O. Box 1687
Jackson, WY 83001
lcolasuonno@jacksonwy.gov

U.S. Mail
 Hand delivered
 Court Mailbox
 Email

Jay Jerde
Special Assistant Attorney General
Wyoming Attorney General's Office
109 State Capitol
Cheyenne, Wyoming 82002
jay.jerde@wyo.gov

U.S. Mail
 Hand delivered
 Court Mailbox
 Email


Junuenth Daniels, *Paralegal*
Frederick J. Harrison, P.C.