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**Admitted Pro Hac Vice*

**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,)

v.)

Case No. 18853

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 DISTRICT COURT:

NOTICE IS HEREBY GIVEN that Proposed Intervenors (Appellants), Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, and Right to Life of Wyoming, appeal the *Order Denying Motion to Intervene* entered herein on July 20, 2023.

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 18853 in the District Court of the Ninth Judicial District in Teton County, Wyoming, which 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 July 20, 2023, by District Judge Melissa M. Owens in the above-entitled matter, and which *Order* was entered in the records herein on July 20, 2023. Said *Order* 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 endorse 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 certify that all relevant portions of the transcript of evidence deemed necessary for this appeal have been ordered and 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 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 *Amended Complaint for Declaratory Judgment and Injunctive Relief* filed by Plaintiffs on March 21, 2023 as **item B** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is *Wyoming Legislators, Wyoming Secretary of State, and Right to Life of Wyoming’s Motion to Intervene*, filed on April 6, 2023, as **item C** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is *Memorandum of Wyoming Legislators, Wyoming Secretary of State, and Right to Life of Wyoming in Support of Motion to*

Intervene, filed on April 6, 2023, as **item D** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is *Plaintiffs' Amended Opposition to Motion to Intervene*, filed on April 24, 2023, as **item E** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is *State Defendants' Response to Proposed Intervenor's Motion to Intervene*, filed on April 25, 2023, as **item F** and by this reference made expressly part of this *Notice of Appeal*.

Further listed in the *Appendix* is *Proposed Intervenor's Reply in Support of Wyoming Legislators, Wyoming Secretary of State, and Right to Life of Wyoming's Motion to Intervene*, filed on May 19, 2023, as **item G** 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 Intervenor/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 July 20, 2023. 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 4th day of August, 2023.



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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. 18853 on July 20, 2023.

B

Amended Complaint for Declaratory Judgment and Injunctive Relief filed by Plaintiffs, filed herein in Docket No. 18853 on March 21, 2023.

C

Wyoming Legislators, Wyoming Secretary of State, and Right to Life of Wyoming's Motion to Intervene, filed herein in Docket No. 18853 on April 6, 2023.

D

Memorandum of Wyoming Legislators, Wyoming Secretary of State, and Right to Life of Wyoming in Support of Motion to Intervene, filed herein in Docket No. 18853 on April 6, 2023.

E

Plaintiff's Amended Opposition to Motion to Intervene, filed herein in Docket No. 18853 on April 24, 2023.

F

State Defendants' Response to Proposed Intervenors' Motion to Intervene, filed herein in Docket No. 18853 on April 25, 2023.

G

Proposed Intervenors' Reply in Support of Wyoming Legislators, Wyoming Secretary of State, and Right to Life of Wyoming's Motion to Intervene, filed herein in Docket No. 18853 on May 19, 2023.

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August 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:

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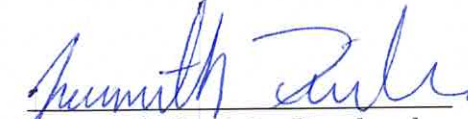
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