

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

EMAIL FILED

Original Rqd by Mail: YES NO
Total Pages: 4
Amount Due: \$ 4.00

email
FILED 4:52pm
TETON COUNTY, WYOMING
AUG 16 2022

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@adfllegal.org

CLERK OF DISTRICT COURT

Attorneys for Proposed Intervenors Rep. Rachel Rodriguez-Williams, Rep. Chip Neiman, 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; 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.)

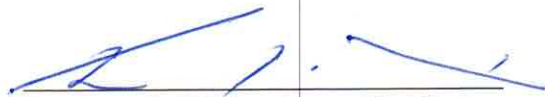
WYOMING LEGISLATORS' AND RIGHT TO LIFE OF WYOMING'S
MOTION TO INTERVENE

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

The Legislators and Right to Life of Wyoming seek intervention as of right, and alternatively, permissive intervention under Wyoming Rule of Civil Procedure 24. Under that rule and the jurisprudence interpreting it, granting the Legislators' and Right to Life of Wyoming's Motion to Intervene is both warranted and appropriate. Proposed Intervenors have filed this motion in a timely manner. And they have unique and significantly protectable interests at stake in this action, interests which 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 Legislators and Right to Life of Wyoming respectfully request that this Court grant their Motion to Intervene.

RESPECTFULLY SUBMITTED this 16th day of August, 2022.



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

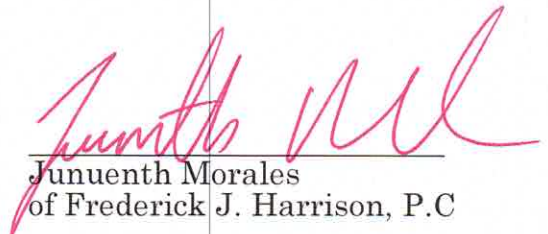
I hereby certify that on August 16, 2022, I electronically filed the foregoing paper with the Clerk of Court via email at <http://www.tetoncountywy.gov/2069/EmailFax-Filing>. A true copy of the foregoing was served via email, mailed, postage prepaid, to the following:

John H. Robinson
Marci C. Bramlet
Robinson Welch Bramlet LLC
172 Center Street, Suite 202
P.O. Box 3139
Jackson, WY 83001
john@lawrwb.com
marci@lawrwb.com

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

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

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


Junuenth Morales
of Frederick J. Harrison, P.C