

Frederick J. Harrison #5-1586  
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*\*Pro hac vice application forthcoming*

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

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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. )

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

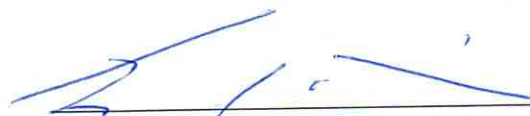
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COME NOW Proposed Intervenors—Individual Wyoming Legislators Representative Rachel Rodriguez-Williams and Representative Chip Neiman, Wyoming Secretary of State Chuck Gray, and Right to Life of Wyoming—by and through undersigned counsel, file this 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.



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Chip Neiman, and Right to Life of  
Wyoming*

*\*Pro hac vice application forthcoming*

## CERTIFICATE OF SERVICE

I hereby certify that on this 6<sup>th</sup> 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:

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