

FILED
02-22-2024
CLERK OF WISCONSIN
SUPREME COURT

IN THE SUPREME COURT OF WISCONSIN
NO. 2024-AP-3300A

PLANNED PARENTHOOD OF WISCONSIN,
on behalf of itself, its employees, and its patients;

KATHY KING, M.D.

and

ALLISON LINTON, M.D., M.P.H.
on behalf of themselves and their patients,

and

MARIA L.,

JENNIFER S.,

LESLIE K.,

and

ANAIS L.,

Petitioners,

v.

JOEL URMANSKI, in his official capacity as District Attorney
for Sheboygan County, Wisconsin,
615 North 6th Street, First Floor
Sheboygan, Wisconsin 53081

ISMAEL R. OZANNE, in his official capacity as District Attorney
for Dane County, Wisconsin,
215 South Hamilton Street, #3000
Madison, Wisconsin 53703

and,

JOHN T. CHISHOLM, in his official capacity as District Attorney
for Milwaukee County, Wisconsin,
821 West State Street, Room 405
Milwaukee, Wisconsin 53233

Respondents, as Class Representatives for
all Wisconsin District Attorneys.

**NOTICE OF MOTION AND MOTION TO PROCEED USING
PSEUDONYMS AND ASSOCIATED RELIEF**

PINES BACH LLP
Diane M. Welsh, SBN 1030940
Christa O. Westerberg, SBN 1040530
Will Kramer, SBN 1102671
Samantha R. Foran, SBN 1122735
122 West Washington Ave.,
Suite 900
Madison, WI 53703
(608) 251-0101 (telephone)
(608) 251-2883 (facsimile)
dwelsh@pinesbach.com
cwesterberg@pinesbach.com
wkramer@pinesbach.com
sforan@pinesbach.com

*Attorneys for Petitioners Planned
Parenthood of Wisconsin, Dr. Kathy King,
Dr. Allison Linton, Maria L., Jennifer S.,
Leslie K., and Anais L.*

February 22, 2024

PLEASE TAKE NOTICE that Petitioners, by their attorneys, Pines Bach LLP, move the Court pursuant to Wis. Stat. §§ 801.21 and 809.14 for an order permitting Petitioners Maria L., Jennifer S., Leslie K., and Anais L. (collectively, the “Women Petitioners”) to proceed anonymously by using pseudonyms as the Court considers whether to grant the Petition for Original Action filed herewith (“Petition”).¹ Should the Court grant the Petition, Petitioners ask that the Court grant an order permitting the Women Petitioners to continue appearing in this matter by pseudonym, requiring any unredacted copies of their affidavits be filed under seal, and requiring the other parties to join a protective order that requires the Women Petitioners’ identities to be kept confidential on an attorneys’ eyes only basis. The administration of justice and the public’s overriding interest in nondisclosure requires that the Women Petitioners’ identities be kept confidential.

The grounds for this motion are more fully set forth in Petitioners’ Brief in Support of Motion to Proceed Using Pseudonyms and Associated Relief, which is attached herewith.

¹ If the Court does not grant the Petition, there will have been no need for the Court to obtain unredacted copies of the affidavits. Hence, Petitioners request that the Court not require that unredacted affidavits be filed until such time that the Petition is granted and this motion has been granted.

Respectfully submitted this 22nd day of February, 2024.

PINES BACH LLP

By: Electronically signed by Diane Welsh

Diane M. Welsh, SBN 1030940

Christa O. Westerberg, SBN 1040530

Will Kramer, SBN 1102671

Samantha R. Foran, SBN 1122735

*Attorneys for Petitioners Planned
Parenthood of Wisconsin, Dr. Kathy King,
Dr. Allison Linton, Maria L., Jennifer S.,
Leslie K., and Anais L.*

Mailing Address:

122 West Washington Ave.,
Suite 900

Madison, WI 53703

(608) 251-0101 (telephone)

(608) 251-2883 (facsimile)

dwelsh@pinesbach.com

cwesterberg@pinesbach.com

wkramer@pinesbach.com

sforan@pinesbach.com