

FILED

04-25-2024

CLERK OF WISCONSIN

SUPREME COURT

No. 24AP330-OA

In the Supreme Court of Wisconsin

PLANNED PARENTHOOD OF WISCONSIN, on behalf of itself, its employees, and its patients, KATHY KING, M.D., ALLISON LINTON, M.D., M.P.H., on behalf of themselves and their patients, MARIA L., JENNIFER S., LESLIE K., and ANAIS L., PETITIONERS,

v.

JOEL URMANSKI, in his official capacity as District Attorney for Sheboygan County, Wisconsin, ISMAEL R. OZANNE, in his official capacity as District Attorney for Dane County, Wisconsin and JOHN T. CHISHOLM, in his official capacity as District Attorney for Milwaukee County, Wisconsin, RESPONDENTS.

**PETITION TO INTERVENE, OR, IN THE ALTERNATIVE, TO
FILE AN AMICUS BRIEF, ON BEHALF OF WISCONSIN
RIGHT TO LIFE, WISCONSIN FAMILY ACTION, AND PRO-
LIFE WISCONSIN**

WISCONSIN INSTITUTE FOR
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Proposed Intervenor, Wisconsin Right to Life, Wisconsin Family Action, and Pro-Life Wisconsin, by their undersigned attorneys at the Wisconsin Institute for Law & Liberty and the Thomas More Society, pursuant to Wis. Stat. §§ 809.13 and/or 803.09, hereby move to intervene to oppose this Petition for Original Action, or, if the Court accepts this original action, to oppose Petitioners' claims on the merits.

In the alternative, pursuant to Wis. Stat. § 809.19(7)(b), Proposed Intervenor move to file their proposed response as an amicus brief in opposition to this Petition for Original Action. Proposed Intervenor's brief in support of intervention also explains the interest of the Proposed Intervenor and why an amicus brief by them is desirable. *See* Wis. Stat. § 809.19(7)(a).

This motion is timely, both with respect to intervention, and with respect to the deadline for filing an amicus brief according to the deadlines set forth by this Court, as well as by statute. 4/16/24 Order; Wis. Stat. § 809.19(7)(b); Wis. Stat. § 809.70(2).

This motion is supported by the affidavits and brief in support of intervention submitted simultaneously with this motion, and is accompanied by a proposed response (or, in the alternative, amicus brief) in opposition to the Petition for Original Action.

CONCLUSION

This Court should reject Petitioners' Original Action Petition and their attempt to create a constitutional right to abortion in Wisconsin. But, if this Court takes this original action, it should grant Proposed Intervenor's motion to intervene to oppose this claim on the merits or, in the alternative, grant Proposed Intervenor leave to file their Proposed Response as an amicus brief.

Dated: April 25, 2024.

Respectfully submitted,

WISCONSIN INSTITUTE FOR
LAW & LIBERTY

Electronically signed by Luke N. Berg

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