

**FILED**  
**01-07-2025**  
**CLERK OF WISCONSIN**  
**SUPREME COURT**

**IN THE SUPREME COURT OF WISCONSIN**

---

PLANNED PARENTHOOD OF WISCONSIN, et al.  
*Petitioners,*

Case No. 2024AP330-OA

v.

JOEL URMANSKI, et al.  
*Respondents.*

---

**MOTION OF AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF  
WISCONSIN, WISCONSIN DOULAS OF COLOR COLLECTIVE,  
WISCONSIN ABORTION SUPPORT NETWORK, REPRODUCTIVE  
JUSTICE ACTION-MILWAUKEE, AND FREEDOM, INC. FOR LEAVE  
TO FILE A NONPARTY BRIEF**

---

Hayley I. Archer  
State Bar. No. 1101459  
AMERICAN CIVIL LIBERTIES OF WISCONSIN  
FOUNDATION, INC.  
207 East Buffalo Street #325  
Milwaukee, WI 53202  
Tel: (414) 272-4032 x 245  
Email: harcher@aclu-wi.org  
*Counsel for Amici Curiae*

The American Civil Liberties Union of Wisconsin Foundation, Wisconsin Doulas of Color Collective, Wisconsin Abortion Support Network, Reproductive Justice Action-Milwaukee, and Freedom, Inc. (“*amici*”), by undersigned counsel, respectfully move this Court pursuant to Wis. Stat. § 809.19(7)(a) for leave to file a non-party brief in support of petitioners Planned Parenthood of Wisconsin, et al. Undersigned counsel will conclude employment with the American Civil Liberties Union of Wisconsin Foundation as of January 10, 2025, due to a planned transition. Accordingly, counsel respectfully requests the Court accept the attached nonparty brief, recognizing that no scheduling order has yet been issued in this matter. On December 13, 2024, undersigned counsel contacted the Deputy Clerk of the Court, who recommended explaining the circumstances to request acceptance of the premature filing.

As grounds for this motion, *amici* state as follows:

1. The American Civil Liberties Union Foundation of Wisconsin is a statewide, non-profit, non-partisan organization dedicated to the liberty and equality embodied in the federal and state constitutions and civil rights laws, including the individual right to make reproductive decisions.
2. Wisconsin Doulas of Color Collective is a village of doulas of color reaffirming birthing people's power and providing accessible and culturally sensitive full-spectrum support for all pregnancy experiences, as well as addressing infant and maternal mortality rates and birth disparities for people of color across the state of Wisconsin.

3. Wisconsin Abortion Support Network a group of volunteers offering free abortion doula support, including physical, mental, emotional, and informational support, to pregnant people before, during, and after abortion care.

4. Reproductive Justice Action-Milwaukee is a grassroots organization of activists fighting for reproductive justice for all humans in Milwaukee.

5. Freedom, Inc. is a Black and Southeast Asian non-profit organization working with low- to no-income communities of color to achieve social justice through direct services with leadership development and community organizing to bring social, political, cultural, and economic change to end violence against women, gender-non-conforming and transgender folks, and children within communities of color.

6. This case seeks to determine whether a near-total abortion ban violates the Wisconsin Constitution's guarantees of inherent rights and equal protection.

7. *Amici* include organizations with substantial expertise in maternal health, reproductive rights and justice, and the lived experiences of marginalized communities in Wisconsin. As such, their insights are directly relevant to the Court's assessment of a near-total abortion ban's impacts on the lives of people across Wisconsin.

8. The *amicus* brief will demonstrate how enforcement of a near-total abortion ban in Wisconsin would disproportionately impact people of color, rural residents, immigrants, undocumented individuals, and low-income populations, by exacerbating disparities in reproductive health access and economic inequalities

across the state. Amici will emphasize the potential ban's compounding harms—ranging from severe health risks to significant financial burdens—that undermine the constitutional promise of equality and liberty for Wisconsin's most vulnerable people.

9. Given their experience with a spectrum of reproductive and commitment to advocating for reproductive rights in Wisconsin, *amici* seek to submit a brief addressing the issues for the Court.

For the foregoing reasons, *amici* respectfully request that this Court grant their motion for leave to file the attached non-party brief.

Dated this 7th day of January, 2025. Respectfully submitted,



---

Hayley I. Archer (WBN 1101459)  
American Civil Liberties  
of Wisconsin Foundation, Inc.  
207 East Buffalo Street #325  
Milwaukee, WI 53202  
Telephone: (414) 272-4032 x 245  
Email: harcher@aclu-wi.org