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IN THE SUPREME COURT OF THE STATE OF IDAHO

COMMITTEE TO PROTECT AND PRESERVE THE
IDAHO CONSTITUTION, INC.; MORMON WOMEN
FOR ETHICAL GOVERNMENT; SCHOOL DISTRICT
NO. 281, LATAH COUNTY, STATE OF IDAHO;
IDAHO EDUCATION ASSOCIATION, INC.; JERRY
EVANS; MARTA HERNANDEZ; STEPHANIE
MICKELSEN; ALEXIS MORGAN, on behalf of herself
and her minor children; KRISTINE ANDERSON, on
behalf of herself and her minor children; each of the
foregoing individually and as private attorneys
general on behalf of the public of the State of Idaho,

Petitioners,

v.

STATE OF IDAHO, acting by and through the IDAHO
STATE TAX COMMISSION,

Respondent,

and

IDAHO STATE LEGISLATURE

Intervenor-Respondent.

**Docket No. 53264-
2025**

**MOTION FOR
LEAVE TO FILE
BRIEF OF AMICI
CURIAE**

MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE

I. INTRODUCTION

The Notre Dame Education Law Project and Catholic Education Partners move under I.A.R. 8(b) for permission for leave to file a brief as amici curiae in support of Respondent State of Idaho and the intervening Parent Petitioners.

II. NOTRE DAME EDUCATION LAW PROJECT AND CATHOLIC EDUCATION PARTNERS' INTEREST REGARDING THE MOTION

The Notre Dame Education Law Project's mission is to enhance civil society, promote educational opportunity, and protect religious liberty by supporting educational pluralism through research scholarship, and legal advocacy.

Catholic Education Partners partners with Catholic school leaders and families, bishops, clergy, and other stakeholders to advance state policies that allow more families to access Catholic education, while protecting the freedom of Catholic schools to advance their unique mission.

Both of these organizations have significant knowledge and expertise

about the contributions that private education makes to the public good, including improving educational outcomes for students who receive private education. These organizations are able to provide the Court with a broader perspective on parental empowerment in education, including the successful experiences in other states with programs similar to the Idaho Parental Choice Tax Credit.

III. CONCLUSION

The Notre Dame Education Law Project and Catholic Education Partners respectfully request that this Court allow them to provide input on the issues in this case by filing the attached amicus brief, addressing the benefits of private education to the public good.

Dated: November 10, 2025

Respectfully submitted,

/s/ Megan M. Wold

Megan M. Wold

Idaho Bar No. 12560

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of November, 2025, I filed a true and correct copy of the foregoing through the iCourt system, which caused the following parties or counsel to be served by electronic means:

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