

Daniel W. Bower, ISB #7204
MORRIS BOWER & HAWS PLLC
1305 12th Ave. Road
Nampa, Idaho 83686
Telephone: (208) 345-3333
Fax No.: (208) 345-4461
dbower@morrisbowerhaws.com

Attorneys for Proposed Intervenor-Respondent

IN THE SUPREME COURT OF THE STATE OF IDAHO

PLANNED PARENTHOOD OF THE
GREAT NORTHWEST, HAWAII,
ALASKA, INDIANA, KENTUCKY, on
behalf of itself, its staff, physicians and
patients, and CAITLIN GUSTAFSON,
M.D., on behalf of herself and her patients,

Petitioners,

v.

STATE OF IDAHO,

Respondent,

SCOTT BEDKE, in his official capacity as
Speaker of the House of Representatives of
the State of Idaho; CHUCK WINDER, in
his capacity as President Pro Tempore of the
Idaho State Senate, and the SIXTY-SIXTH
IDAHO LEGISLATURE,

Proposed Intervenor-Respondent.

Case No. 49615-2022

**PETITION FOR LEAVE TO
INTERVENE BY IDAHO
LEGISLATURE**

COME NOW, the Speaker of the House of Representatives for the State of Idaho, Scott Bedke, Senate President Pro Tempore Chuck Winder, and the Sixty-Sixth Idaho Legislature (collectively the “Legislature”) and seek to intervene in this action to defend the constitutionality

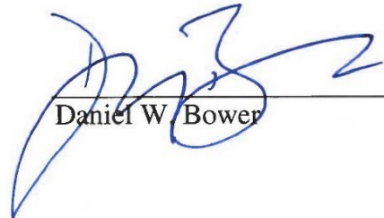
of Senate Bill 1309 (S1309). The Legislature seeks intervention pursuant to Idaho Appellate Rule 7.1. Alternatively, the Legislature requests leave to file an *amici curiae* brief and to participate in oral argument pursuant to Rule 8 of the Idaho Appellate Rules.

The Legislature is prepared to comply with the time frames and deadlines set forth in this Court's Order Granting Motion to Reconsider filed on April 8, 2022. Accordingly, granting leave to intervene will not cause any delay

This Petition is further supported by the accompanying Memorandum in Support of Petition for Leave to Intervene filed concurrently herewith.

Dated this 14th day of April, 2022.

MORRIS BOWER & HAWS PLLC



Daniel W. Bower

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2022, I filed and served the foregoing via the Odyssey File and Serve system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Michael J. Barlett	<input type="checkbox"/>	U.S. Mail
BARTLETT & FRENCH LLP	<input type="checkbox"/>	Hand Delivered
1002 W. Franklin St.	<input type="checkbox"/>	Facsimile: 208-629-2460
Boise, ID 83702	<input checked="" type="checkbox"/>	iCourt: michael@bartlettfrench.com

Attorneys for Petitioners

Alan E. Schoenfeld	<input type="checkbox"/>	U.S. Mail
Michelle N. Diamond	<input type="checkbox"/>	Hand Delivered
Rachel E. Craft	<input type="checkbox"/>	Facsimile: 212-230-8888
Cindy Y. Pan	<input checked="" type="checkbox"/>	iCourt: alan.schoenfeld@wilmerhale.com
Samuel J. McHale		michelle.diamond@wilmerhale.com
WILMER CUTLER PICKERING HALE AND		rachel.craft@wilmerhale.com
DORR LLP		cindy.pan@wilmerhale.com
7 World Trade Center		sam.mchale@wilmerhale.com
New York, NY 10007		

Attorneys for Petitioners

Joseph H. Rosenberg	<input type="checkbox"/>	U.S. Mail
Ann E. Himes	<input type="checkbox"/>	Hand Delivered
WILMER CUTLER PICKERING HALE AND	<input type="checkbox"/>	Facsimile: 202-663-6363
DORR LLP	<input checked="" type="checkbox"/>	iCourt: joseph.rosenberg@wilmerhale.com
1875 Pennsylvania Avenue NW		annie.himes@wilmerhale.com
Washington, DC 20006		

Attorneys for Petitioners

Vikram P. Iyer	<input type="checkbox"/>	U.S. Mail
WILMER CUTLER PICKERING HALE AND	<input type="checkbox"/>	Hand Delivered
DORR LLP	<input type="checkbox"/>	Facsimile: 213-443-5400
350 South Grand Ave.	<input checked="" type="checkbox"/>	iCourt: vikram.iyer@wilmerhale.com
Los Angeles, CA 90071		

Attorneys for Petitioners

Megan A. Larrondo
Dayton P. Reed
STATE OF IDAHO
DEPUTY ATTORNEYS GENERAL
954 W. Jefferson Street, 2nd Floor
PO Box 83720
Boise, ID 83720-0010

U.S. Mail
 Hand Delivered
 Facsimile: 202-663-6363
 iCourt: megan.larrondo@ag.idaho.gov
dayton.reed@ag.idaho.gov

Attorneys for Respondent

/s/ Daniel W. Bower

Daniel W. Bower