

IN THE SUPREME COURT  
STATE OF NORTH DAKOTA

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Supreme Court No. 20220260

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Drew H. Wrigley, in his official capacity as Attorney General for the State of North  
Dakota,

Petitioner,

v.

The Honorable Bruce A. Romanick, Judge of District Court, South Central Judicial  
District; Access Independent Health Services, Inc., d/b/a Red River Women's Clinic, on  
behalf of itself and its patients, and Kathryn L. Eggleston, M.D., on behalf of herself and  
her patients; and Birch P. Burdick, in his official capacity as the State Attorney for Cass  
County,

Respondents.

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PETITION FOR SUPERVISORY WRIT FROM THE DISTRICT COURT ORDER  
DATED AUGUST 25, 2022, BURLEIGH COUNTY, NORTH DAKOTA, SOUTH  
CENTRAL JUDICIAL DISTRICT, HON. BRUCE ROMANICK

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**MOTION REQUESTING PERMISSION TO APPEAR AS  
NONRESIDENT COUNSEL**

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[¶1] Jocelyn Keider, duly licensed attorney, hereby requests permission to appear as nonresident counsel for *amici curiae*, the American College of Obstetricians and Gynecologists, the American Medical Association, and the Society for Maternal-Fetal Medicine, in the above-captioned matter. Counsel designates Elizabeth Elsberry, ND Bar ID 06286, and Christopher Rausch, ND Bar ID 06277, of Elsberry & Shively, P.C., 103 South 3rd Street, Suite 5, Bismarck, ND 58501, as the associate counsel admitted and licensed to practice law in North Dakota. In support of this motion, counsel submits the affidavit required by North Dakota Admission to Practice Rule 3. In further compliance with Rule 3, counsel states that she has simultaneously filed a copy of this motion and affidavit/declaration, as well as the applicable fee of \$380, with the State Board of Law Examiners.

Dated: November 21, 2022

Respectfully submitted,

/s/ Jocelyn Keider  
Jocelyn Keider  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
Phone: (617) 526-6000  
jocelyn.keider@wilmerhale.com

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**AFFIDAVIT/DECLARATION OF JOCELYN KEIDER**

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[¶1] I, Jocelyn Keider, being first duly sworn, state the following:

[¶2] I submit this affidavit/declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter, on behalf of *amici curiae*, the American College of Obstetricians and Gynecologists, the American Medical Association, and the Society for Maternal-Fetal Medicine.

[¶3] First, I am admitted to practice and am a member in good standing of the bar in the following jurisdictions: Massachusetts (State Bar No. 694801, admitted 2015).

[¶4] Second, I am not presently subject to a disciplinary proceeding in any jurisdiction.

[¶5] Third, I am not under any restriction or probation in the practice of law in any jurisdiction in which I am licensed.

[¶6] Fourth, I am not now and never have been suspended or disbarred from a court in any jurisdiction.

[¶7] Fifth, I have not appeared in any North Dakota actions during the prior three years.

[¶8] Sixth, my address is 60 State Street, Boston, Massachusetts, 02109, my telephone number is (617) 526-6000, and my e-mail address is [jocelyn.keider@wilmerhale.com](mailto:jocelyn.keider@wilmerhale.com).

[¶9] Seventh, I have remitted the required fee to the State Board of Law Examiners.

[¶10] I declare under penalty of perjury under the law of North Dakota, that the foregoing is true and correct. Signed on the 21st day of November, 2022, at Boston, MA, USA.

/s/ Jocelyn Keider  
Jocelyn Keider

**CERTIFICATE OF SERVICE BY ELECTRONIC MAIL**

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her patients; and Birch P. Burdick, in his official capacity as the State Attorney for Cass  
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I hereby certify that a true and correct copy of the following documents:

**Motion Requesting Permission to Appear as Nonresident Counsel  
Affidavit/Declaration of Jocelyn Keider**

were, on November 21, 2022, served via electronic mail to the following:

Clerk of the Supreme Court  
supclerkofcourt@ndcourts.gov

Cassandra D’Alessandro  
casey.dalesandro@weil.com

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by electronically serving through the North Dakota Supreme Court filing system, the same to the person above-named at the above-referenced email address. To the best knowledge of the undersigned, the email address above given is the actual email address of the party intended to be so served. The above documents were emailed in accordance with the provisions of the North Dakota Rules of Appellate Procedure.

/s/ Betsy Elsberry  
Betsy Elsberry (N.D. # 06286)  
Elsberry & Shively, P.C.  
103 South 3rd Street, Suite 5  
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Phone: (701) 557-3384  
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/s/ Christopher Rausch  
Christopher Rausch (N.D. # 06277)  
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