

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] Molly A. Meegan, duly licensed attorney, hereby requests permission to appear as nonresident counsel for *amicus curiae*, the American College of Obstetricians and Gynecologists, 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/ Molly A. Meegan  
Molly A. Meegan  
AMERICAN COLLEGE OF  
OBSTETRICIANS AND  
GYNECOLOGISTS  
409 12th Street SW  
Washington, D.C. 20024  
Phone: (202) 863-2585  
mmeegan@acog.org

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**AFFIDAVIT/DECLARATION OF MOLLY A. MEEGAN**

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[¶1] I, Molly A. Meegan, 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 *amicus curiae*, the American College of Obstetricians and Gynecologists.

[¶3] First, I am admitted to practice and am a member in good standing of the bar in the following jurisdictions: New York (Bar No. 2523728, admitted 1993), District of Columbia (Bar No. 443178, admitted 1994).

[¶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 409 12th Street SW, Washington, D.C. 20024, my telephone number is (202) 863-2585, and my e-mail address is mmeegan@acog.org.

[¶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 Washington, D.C., USA.

/s/ Molly A. Meegan  
Molly A. Meegan

**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 Molly A. Meegan**

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

Thomas A. Dickson  
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Courtney R. Titus  
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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  
Bismarck ND 58501  
Phone: (701) 557-3384  
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/s/ Christopher Rausch  
Christopher Rausch (N.D. # 06277)  
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