

Akilah Lane (Bar No. 60742990)
Alex Rate (Bar No. 11226)
ACLU of Montana
P.O. Box 1968
Missoula, MT 59806
406-203-3375
ratea@aclumontana.org
lanea@aclumontana.org

John Knight, pro hac vice forthcoming
ACLU Foundation
LGBTQ & HIV Project
150 North Michigan Avenue, Suite 600
Chicago, IL 60601
Telephone: 312-201-9740
Facsimile: 312-288-5225
jaknight@aclu.org

F. Thomas Hecht, pro hac vice forthcoming
Tina B. Solis, pro hac vice forthcoming
Seth A. Horvath, pro hac vice forthcoming
Nixon Peabody LLP
70 West Madison Street, Suite 3500
Chicago, IL 60601
Telephone: 312-977-4443
Facsimile: 312-977-4405
fthecht@nixonpeabody.com
tbsolis@nixonpeabody.com
sahorvath@nixonpeabody.com

Elizabeth Halverson PC
1302 24th Street West #393
Billings, MT 59102
406-698-9929
ehalverson@halversonlaw.net

CLERK OF THE
DISTRICT COURT
TERRY HALPIN
2021 DEC 13 P 3:33
FILED
BY _____ 41
DEPUTY

**IN THE THIRTEENTH JUDICIAL DISTRICT COURT
COUNTY OF YELLOWSTONE**

AMELIA MARQUEZ, an individual;)
and JOHN DOE, an individual;)
)
Plaintiffs,)

v.)

STATE OF MONTANA; GREGORY)
GIANFORTE, in his official capacity as)
the Governor of the State of Montana;)
the MONTANA DEPARTMENT OF)
PUBLIC HEALTH AND HUMAN)
SERVICES; and ADAM MEIER, in his)
official capacity as the Director of the)
Montana Department of Public Health)
and Human Services,)

Defendants.)
)
)
)

Case No. DV 21-00873

Hon. Michael G. Moses

**PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO AMEND COMPLAINT**

Plaintiffs Amelia Marquez and John Doe (together, "Plaintiffs") move this Court, without opposition, pursuant to Rule 15(a) of the Montana Rules of Civil Procedure, for leave to amend their complaint against the State of Montana; its governor, Gregory Gianforte; the Montana Department of Health and Human Services ("DPHHS"); and DPHHS's director, Adam Meier. Plaintiffs contemporaneously file their memorandum in support of this motion. The undersigned counsel provided notice of this motion to Defendants' counsel on November 15, 2021.

Dated: December 3, 2021

Respectfully submitted,

By: 

Akilah Lane

Akilah Lane
Alex Rate
ACLU of Montana
P.O. Box 1968
Missoula, MT 59806
406-203-3375
ratea@aclumontana.org
lanea@aclumontana.org

John Knight, pro hac vice forthcoming
ACLU Foundation
LGBTQ & HIV Project
150 North Michigan Avenue, Suite 600
Chicago, IL 60601
Telephone: 312-201-9740
Facsimile: 312-288-5225
jknight@aclu-il.org

F. Thomas Hecht, pro hac vice forthcoming
Tina B. Solis, pro hac vice forthcoming
Seth A. Horvath, pro hac vice forthcoming
Nixon Peabody LLP
70 West Madison Street, Suite 3500
Chicago, IL 60601
Telephone: 312-977-4443
Facsimile: 312-977-4405
fthecht@nixonpeabody.com
tbsolis@nixonpeabody.com

sahorvath@nixonpeabody.com

Elizabeth Halverson PC
1302 24th Street West #393
Billings, MT 59102
406-698-9929
ehalverson@halversonlaw.net

CERTIFICATE OF SERVICE

I, Krystal Pickens, hereby certify on this date I emailed a true and accurate copy of the foregoing document to:

DAVID M.S. DEWHIRST

Solicitor General

KATHLEEN L. SMITHGALL

Assistant Solicitor General

PATRICK M. RISKEN

Assistant Attorney General

JEREMIAH LANGSTON

Assistant Attorney General

Office of the Attorney General, State of Montana

P.O. Box 201401

Helena, MT 59620-1401

DATED: December 3, 2021.



Krystal Pickens