

IN THE SUPREME COURT OF THE STATE OF MONTANA  
No. DA 23-0272

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PLANNED PARENTHOOD OF MONTANA, et al.,

*Plaintiffs & Appellees,*

v.

STATE OF MONTANA, et al.,

*Defendants & Appellants.*

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UNOPPOSED MOTION OF NATIONAL CENTER FOR YOUTH LAW  
FOR LEAVE TO APPEAR AS AMICUS CURIAE

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On Appeal from the Montana First Judicial District Court  
Lewis & Clark County  
Cause No. DDV-2013-407  
Honorable Judge Christopher Abbott

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The National Center for Youth Law (“NCYL”) respectfully requests the Court grant it leave to submit an amicus curiae brief in this matter, pursuant to Mont. R. App. P. 12(7). In support of its motion, NCYL states as follows:

**I. NCYL’s interest**

NCYL is a 501(c)(3) nonprofit organization that advocates for young people, working to center the voices and experiences of youth and help advance their educational, health, and social wellbeing and opportunities. For more than 50 years, NCYL has fought to ensure that youth’s rights, dignity, and autonomy are respected in health, immigration, education, justice, and child welfare systems across the United States. NCYL’s extensive experience representing the interests of young people makes it uniquely situated to discuss the impacts of the Parental Consent Act on youth in the foster care system.

**II. Issue on which NCYL wishes to submit an amicus brief**

NCYL wishes to submit an amicus brief regarding the Parental Consent Act’s impact on youth living in foster care.

**III. Reasons an amicus brief is desirable**

The Parental Consent Act will adversely impact Montanans. An

amicus brief from NCYL would provide the Court relevant background information related to the Parental Consent Act's particularly harmful impact on youth in foster care who cannot readily obtain parental consent for abortion care. Grounded in social science and law, NCYL's amicus brief will inform the Court of the physical, mental, and social harms the Parental Consent Act will inflict on a population that already faces many barriers to health care.

#### **IV. Party whose position NCYL supports**

NCYL supports the position of the Plaintiffs/Appellees, Planned Parenthood of Montana, et al., in this matter.

#### **V. Parties' positions regarding NCYL's participation as amicus**

The parties have been contacted regarding NCYL's participation as amicus. Neither the Plaintiffs/Appellees, Planned Parenthood of Montana, et al., nor the Defendants/Appellants, State of Montana, et al., oppose or object to NCYL's participation.

#### **VI. Date NCYL's brief can be filed**

If this motion is granted, NCYL proposes to file its amicus brief the same day Plaintiffs/Appellees file their response brief. However, NCYL will conform to any schedule set by the Court.

Respectfully submitted this 20th day of November, 2023.

/s/ *Dimitrios Tsolakidis*

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## CERTIFICATE OF SERVICE

I, Dimitrios Tsolakidis, hereby certify that I have served true and accurate copies of the foregoing motion for leave to the following on November 20, 2023:

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## **CERTIFICATE OF SERVICE**

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