

No. 21-4235

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

STATE OF OHIO, ET AL.,

Plaintiffs-Appellants

v.

XAVIER BECERRA, ET AL.,

Defendants-Appellees.

On Appeal from the United States District Court
for the Southern District of Ohio
Case No. 1:21-cv-675-TSB

**Motion for Leave to File Brief of the American Association of
Pro-Life Obstetricians & Gynecologists, the Christian Medical &
Dental Associations, and the Catholic Medical Association as
Amici Curiae in Support of Appellants**

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Proposed *amici curiae*, the American Association of Pro-Life Obstetricians & Gynecologists (AAPLOG), the Christian Medical & Dental Associations (CMDA), and the Catholic Medical Association (CMA), respectfully move this Court for leave to file a brief as *amici curiae* in support of Appellants. In support of this motion, proposed *amici* state that Appellants consent to the filing of a brief, but due to the short time to file briefs supporting Appellants motion for injunction and the intervening holidays, proposed *amici* did not have an opportunity to obtain consent of Appellees.

The proposed *amici* have a strong interest in ensuring robust conscience protections for health-care professionals, which are protected by law and directly at stake in this case. Unlike Appellant's motion, proposed *amici's* participation in this case will primarily emphasize why the 2021 Final Rule issued by the Department of Health and Human Services violates multiple federal and state conscience laws, violates the Religious Freedom Restoration Act (RFRA), and undermines the public interest.

Therefore, proposed *amici* respectfully request that this Court grant leave to file their brief as *amici curiae*.

Dated: January 18, 2022.

Respectfully submitted,

/s/ John J. Bursch

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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2022, I electronically filed the foregoing motion with the Clerk of the Court for the United States Court of Appeals for the Sixth Circuit by using the appellate CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ John J. Bursch
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