

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

IN RE ADMINISTRATIVE SUBPOENA  
25-1431-032 to Rhode Island Hospital

No. 1:26-mc-00007-MSM-AEM

**CONSENT MOTION FOR LEAVE TO FILE AMICUS BRIEF OF RHODE ISLAND, MASSACHUSETTS, ARIZONA, CALIFORNIA, COLORADO, CONNECTICUT, WASHINGTON, D.C., DELAWARE, ILLINOIS, MAINE, MARYLAND, MICHIGAN, MINNESOTA, NEW JERSEY, NEW MEXICO, NEVADA, NEW YORK, OREGON, WASHINGTON, WISCONSIN AND VERMONT AS *AMICI CURIAE* IN SUPPORT OF PETITIONER’S EMERGENCY MOTION TO QUASH SUBPOENA DUCES TECUM**

Pursuant to Fed. R. Civ. P. 7 and L.R. Cv. 7, proposed Amici Curiae Rhode Island, Massachusetts, and other states (“Amici States”) respectfully move for leave to file an amicus brief in support of Petitioner’s Emergency Motion to Quash Subpoena Duces Tecum (“Motion to Quash”), filed by the Child Advocate for the State of Rhode Island on May 4, 2026. ECF No. 1. Counsel for the Amici States have conferred with counsel of record for the parties in this case, and both Petitioners and Respondents consent to the filing of this motion. A copy of the proposed brief is attached to this motion.

The Amici States are sovereign states with a strong interest in the regulation of the practice of medicine within their own borders, including by licensing doctors and other medical professionals; implementing standards of care for a wide variety of medical procedures and treatments; and enforcing those standards and other related regulations. Many Amici States have enacted laws safeguarding access to transgender healthcare services and protecting people who lawfully provide or help others access such care. They are also home to hospitals, like Rhode Island Hospital, that provide economic, educational, and technological fuel to their economies.

It is within a court’s “sound discretion” whether to permit amicus briefing. *Strasser v. Doorley*, 432 F.2d 567, 569 (1st Cir. 1970). Amicus briefing may be permitted “to assist the court ‘in cases of general public interest by making suggestions to the court, by providing supplementary assistance to existing counsel, and by insuring a complete and plenary presentation of difficult issues so that the court may reach a proper decision.’” *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll.*, 308 F.R.D. 39, 52 (D. Mass.), *aff’d*, 807 F.3d 472 (1st Cir. 2015) (internal citations and quotations omitted).

This case affects the regulation of medicine in Amici States and is therefore a case affecting the general public interest. Moreover, the proposed brief will assist the Court in its consideration of the pending motion because it provides necessary perspective into the harm the Amici States and their residents face from this investigation and those like it. The Amici States have a unique perspective on the chilling effect on state public policy accomplished through the unlawful and improper campaign by DOJ to intimidate providers of gender-affirming care to abandon their patients (*see Massachusetts v. Trump*, 25-cv-12162 (D. Mass.) (Aug. 1, 2025)).

For the foregoing reasons, the Amici States respectfully request that the Court grant the motion for leave to file an amicus brief in support of Petitioner’s Motion to Quash. ECF No. 1.

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Dated: May 8, 2026

THE STATE OF RHODE ISLAND

By and through its attorneys,

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