

**STATE OF RHODE ISLAND  
PROVIDENCE, Sc.**

**SUPERIOR COURT**

JANE DOE

PLAINTIFF,

v.

ANGÉLICA INFANTE-GREEN, in her  
capacity as the Commissioner of Elementary  
and Secondary Education, Rhode Island  
Department of Education

DEFENDANT

**HEARING DATE: July 17, 2025 (FSC)**

PC-2025-01610

**MOTION OF AMERICAN CIVIL LIBERTIES UNION OF RHODE ISLAND,  
THE LAWYERS COMMITTEE FOR RHODE ISLAND,  
BONNIE TAYLOR, AND ALEXIS TURNER FOR LEAVE TO APPEAR AS  
AMICI CURIAE IN SUPPORT OF DEFENDANT**

The American Civil Liberties Union of Rhode Island, Lawyers Committee for Rhode Island, Bonnie Taylor and Alexis Turner (collectively “proposed amici”) move for leave to appear as amici curiae in the above-captioned action and to file the Memorandum attached hereto in support of the Defendant.

**Interest of the American Civil Liberties Union of Rhode Island**

**The American Civil Liberties Union of Rhode Island (“ACLU-RI”)**, with over 5,000 members, is the Rhode Island affiliate of the American Civil Liberties Union, a nationwide, non-profit, nonpartisan organization. ACLU-RI, like the national organization with which it is affiliated, is dedicated to vindicating the principles of liberty embodied in the Bill of Rights to the U.S. Constitution, including the right to equal protection of the law, encompassing the recognition and expansion of protections for individuals to be free from discrimination based on their sexual orientation, gender identity or expression. In furtherance of that goal, ACLU-RI cooperating

attorneys have, over the past 50 years, consistently challenged adverse government actions on the basis of LGBTQ status, either in direct action or as amicus, in such cases as *Toward A Gayer Bicentennial Committee v. R.I. Bicentennial Foundation*, 417 F. Supp. 642 (D.R.I. 1976) (obtained preliminary injunction requiring endorsement of Gay Pride Parade and use of Old State House for the parade); *Chambers v. Ormiston*, 935 A.2d 956 (R.I. 2007) (action to determine whether family court could recognize a same-sex marriage obtained in another state for the purpose of granting a Rhode Island divorce); *Tiverton School Committee v. McCullough*, (NC-04-0478, Superior Court challenge to denial of health insurance benefits for same-sex spouse; 2005); *In re G.R.K.*, (Superior Court appeal of Probate Court decision denying name change request related to gender transition; 1988); *Tiverton School Committee v. McCullough*, (NC-04-0478, Superior Court challenge to denial of health insurance benefits for same-sex spouse; 2005).

In addition to its history of testifying before the General Assembly in support of numerous bills to establish and expand LGBTQ rights, in 2017, ACLU-RI, along with nine other organizations, formally petitioned the Rhode Island Department of Education under the Administrative Procedures Act to promulgate regulations to protect the rights of transgender students, resulting in the adoption of the Regulation which is the subject of the above-captioned action.

ACLU-RI has a strong, documented, and consistent record spanning fifty years of battle to obtain and preserve the rights of individuals to be protected from discrimination on the basis of their sexual orientation, gender identity or expression, including through the Regulation at issue in this action. Because Plaintiff's action, if accepted, would negate those protections, ACLU-RI submits this memorandum in support of the validity of the Regulation promulgated by Defendant Commissioner.

### **Interest of the Lawyers Committee for Rhode Island**

The Lawyers' Committee for Rhode Island (LCRI) is a Rhode Island nonprofit corporation consisting of attorneys that has come together to hold the government accountable to the law, and protect people, groups and institutions in Rhode Island, by organizing an effective and rapid legal response by Rhode Island lawyers. LCRI was created because, where there is government overreach in violation of the law, lawyers have the tools and the duty to protect those who are impacted. LCRI is engaged in emerging legal issues that are impacting or will impact people, groups, and institutions in Rhode Island. These include those issues that impact federal funding of nonprofits, the rights of immigrants and international students, reproductive rights, the rights of individuals in education institutions, the people's rights to free speech and assembly, all matters involving diversity, equity and inclusion, and laws that impact the courts and the legal profession. LCRI is directly interested in this matter as it impacts Rhode Island educational institutions and issues related to diversity, equity and inclusion.

### **Interest of Bonnie Taylor and Alexis Turner**

**Bonnie Taylor** and **Alexis Turner** are parents of children attending Rhode Island public schools. **Bonnie Taylor** is the parent of a child attending school in the Lincoln Public Schools. As a parent, LGBTQIA advocate and member of ACLU-RI, she has advocated for the rights of the LGBTQIA community, including in her local public schools where she has sought to ensure that all students, including transgender children, have the right to attend and participate in school free from discrimination based upon their gender identity. She strongly supports the Commissioner's Regulation that is at issue and seeks to appear as amicus to ensure that the Court is aware that Plaintiff Doe's experiences, however genuine, are not representative of the community of parents of Rhode Island public school students. In September 2024, Bonnie Taylor

reached out to the Lincoln Superintendent and School Committee in reaction to efforts to undermine protections for LGBTQIA children and families, stating: “I believe it is important for all our children to feel safe and supported to learn and play and be themselves in our community. I support my LGBTQIA neighbors and *support diversity, equity, and inclusion in our schools*...Diversity and inclusion is not just for people that fall within marginalized identities, it supports all our students and families to become compassionate, critical thinkers with empathy and the ability to innovate new solutions for communities to thrive in an ever-changing world.” (Emphasis in original.) Ms. Taylor also attended and spoke at the Lincoln School Committee meeting addressing these issues on September 9, 2024, as reported in <https://steveahlquist.substack.com/p/lincoln-folks-push-back-against-anti>.

**Alexis Turner** is the parent of a gender-nonconforming child who currently attends school in the Richmond/Chariho Public Schools. As the parent of a gender-nonconforming child, Alexis Turner is directly and personally aware of the importance of anti-discrimination regulations that seek to protect children’s mental health and well-being and provide them with a safe and supportive school environment. She strongly supports the Commissioner’s Regulation here at issue and seeks to appear as amicus to ensure that the Court is aware that Plaintiff Doe’s experiences, however genuine, are not representative of the community of Rhode Island public school parents, and to continue to ensure proper anti-discrimination provisions are in place for her child and other gender-nonconforming students.

#### **Notice to the Parties**

Prior to presenting the within motion, undersigned counsel notified all parties of their intention to seek leave to appear as amicus and file the within motion and requested their assent.

Defendant has assented to the motion. Through counsel, Plaintiff has advised that she does not consent.

### **Notice of Hearing**

Please take notice that the within Motion shall be called for hearing on the Formal & Special Cause Calendar on July 17, 2025, at 9:30 am, 250 Benefit Street, Providence, RI, or as soon thereafter as counsel may be heard.

**WHEREFORE**, Proposed Amici respectfully pray that the within motion be granted and the attached memorandum be accepted for filing as the Memorandum of ACLU-RI, LCRI, Taylor, and Turner as amici curiae in support of Defendant.

By their attorneys,

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**CERTIFICATE OF SERVICE**

I hereby certify that, on June 30, 2025:

- ☒ I electronically filed and served this document through the electronic filing system.
- ☒ The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Sonja L. Deyoe  
Sonja L. Deyoe