

John C. Keenan
Keenan Law Firm, P.C.
Marcus Law Bldg.
733 North 7th Street
Boise, Idaho 83702
Tel: (208) 375-2532
Email: law@keenanalaw.org
Idaho State Bar No.: 3873
Designated Local Counsel

James Bopp, Jr.*
Joseph D. Maughon*
THE BOPP LAW FIRM, P.C.
The National Building
1 South Sixth Street
Terre Haute, IN 47807-3510
Tel: (812) 232-2434
Fax: (812) 235-3685
Email: jboppjr@aol.com
jmaughon@bopplaw.com

Attorneys for Non-Party Right to Life of Idaho, Inc.

**Admitted pro hac vice*

UNITED STATES DISTRICT COURT

DISTRICT OF IDAHO

**LOURDES MATSUMOTO,
NORTHWEST ABORTION ACCESS
FUND, and INDIGENOUS IDAHO
ALLIANCE,**

Plaintiffs,

v.

RAÚL LABRADOR, in his official capacity
as in his capacity as the Attorney General for
the State of Idaho,

Defendant.

Case No.: 1:23-cv-00323-DKG

**Non-Party Right to Life of Idaho, Inc.’s,
Request for Oral Argument on Motion to
Quash**

Non-Party Right to Life of Idaho, Inc.’s, Request for Oral Argument on Motion to Quash

Non-party movant Right to Life of Idaho, Inc. (“**RLI**”), hereby advises the Court that its Motion to Quash Subpoena, D. 72 (“**Motion to Quash**”), is fully briefed¹ and, pursuant to L.R. Civ. 7.1(d)(1)(A), requests that the Court “determine[] that oral argument on the motion is appropriate” for the following reasons and schedule the Motion to Quash for oral argument.

RLI respectfully submits that oral argument is warranted because of the weighty Constitutional issues at stake in the Motion to Quash, which asks this Court to give effect to First Amendment protections that are at their highest point when it comes to the “core political speech” at issue here. Mem., D. 72-1, 6–7 (citing *Buckley v. Am. Constitutional Law Found.*, 525 U.S. 182, 186–87 (1999); *McIntyre v. Ohio Elections Comm’n*, 514 U.S. 334, 347 (1995); *Speech First, Inc. v. Cartwright*, 32 F.4th 1110, 1125 (11th Cir. 2022)); *see also* Reply, D. 93, 3.

Additionally, because RLI is a non-party that has been dragged into this litigation despite having no connection to it, the briefing on these important issues has been limited, rather than the ample pleadings and briefing that often precede a court’s decision on any given matter. Oral argument would help clarify any questions not addressed by that limited briefing.

Finally, the issues raised in the Motion to Quash are important to the public interest since they address the question whether an advocacy entity unrelated to the litigation can be forced by its policy opponent to search through years’ worth of its communications in order to produce speech at the heart of the First Amendment, one of the Constitution’s most sacred protections for

¹ See D. Mem. Supp. Mot. Quash Subpoena, D. 72-1 (“**Mem.**”); Pls.’ Opp’n Mot. Quash Subpoena, D. 87; Reply Supp. Mot. Quash Subpoena, D. 93 (“**Reply**”); *see also* Mem. Resp. Mot. Quash, D. 88.

the public, when that speech is not even relevant, Mem., D. 72-1, 13–15, 17–18; Reply, D. 93, 4–7, 9–10. Permitting such a fishing expedition would drastically alter the way all advocacy organizations must function, greatly affecting the public interest.

For all of these reasons, oral argument is both warranted and will be helpful to the Court.

Dated: December 15, 2025

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Boise, Idaho 83702
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Respectfully submitted,

/s/ James Bopp, Jr.
James Bopp, Jr.*
Joseph D. Maughon*
THE BOPP LAW FIRM, PC
The National Building
1 South Sixth Street
Terre Haute, IN 47807-3510
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Fax: (812) 235-3685
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