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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,  
Motion for Stay Pending Disposition of  
Petition for Writ of Mandamus**

Non-party Right to Life of Idaho, Inc., (“**RLI**”) has filed its Petition for Writ of Mandamus (“**Petition**”) in the Ninth Circuit Court of Appeals, *see* D. 118, seeking reversal of this Court’s Order, D. 108 (“**Order**”), to the extent it denied RLI’s motion to quash the subpoena served on RLI by Plaintiffs Northwest Abortion Access Fund, Lourdes Matsumoto, and Indigenous Idaho Alliance (collectively, “**Challengers**”), D. 72. Accordingly, RLI now hereby moves for a stay of the Order pending resolution of the Petition. Absent a stay, the deadlines imposed in the Order, requiring RLI to be burdened in the exercise of its First Amendment rights by discovery that it has objected to, will likely pass before the Petition can be fully briefed and ruled upon. *E.g.*, Fed. R. App. P. 21(b)(1) (providing that, if the appellate court does not deny a petition for writ of mandamus, “it must order the respondent . . . to answer within a fixed time”).

Accordingly, because, as explained in the memorandum accompanying this motion, RLI will likely succeed on the merits of its Petition and will be irreparably harmed absent a stay, and because a stay will not result in harm to any other party and will serve the public interest, a stay should be granted. *See, e.g., Morgan Tire of Sacramento. Inc. v. Goodyear Tire & Rubber Co.*, No. 2:15-CV-00133-KJM-AC, 2015 U.S. Dist. LEXIS 74600, at \*2 (E.D. Cal. June 8, 2015).

Dated: January 16, 2026

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Respectfully submitted,

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