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Attorneys for Plaintiff and Proposed Intervenors

15 **IN THE DISTRICT COURT OF GUAM**  
16 **TERRITORY OF GUAM**

17 GUAM SOCIETY OF OBSTETRICIANS )  
AND GYNECOLOGISTS, *et al.*, )

18 Plaintiffs )

19 vs. )

20 LOURDES A. LEON GUERRERO, *et al.*, )

21 Defendants. )  
22

CIVIL CASE NO. 90-00013

**MOTION FOR DR. BLISS KANESHIRO,  
DR. SHANDHINI RAIDOO, AND  
FAMALAO'AN RIGHTS TO  
INTERVENE AS PLAINTIFFS UNDER  
FED. R. CIV. P. 24**

23 Pursuant to Federal Rule of Civil Procedure 24(a)(2), Dr. Shandhini Raidoo, Dr. Bliss  
24 Kaneshiro, and Famalao'an Rights (together, "Proposed Intervenors" or "Movants") hereby

1 respectfully move for leave to intervene as of right as plaintiffs in the above-captioned case in  
2 order to protect their legal interests and constitutional rights. In the alternative, Proposed  
3 Intervenors request permission to intervene under Federal Rule of Civil Procedure 24(b)(1)(B).  
4 Additionally, Movants join in Plaintiff Dr. William Freeman's opposition to the Attorney  
5 General's motion to vacate the permanent injunction against Public Law 20-134 and dismiss this  
6 case with prejudice, filed concurrently with this motion.

7 This Motion to Intervene is based on the attached Memorandum in Support of the Motion  
8 to Intervene, and the accompanying Declarations of Anita P. Arriola, Dr. William Freeman, Dr.  
9 Bliss Kaneshiro, Dr. Shandhini Raidoo, and Stephanie Lorenzo. As explained in the  
10 accompanying Memorandum, intervention is appropriate because this motion is timely; Movants  
11 have legally protectable interests that would be impaired if the Attorney General's 60(b)(5)  
12 motion is granted and the permanent injunction is vacated; and Movants will not be adequately  
13 represented by existing parties.

14 Executed this 8<sup>th</sup> day of March, 2023

15  
16 By: /s/ Anita P. Arriola  
17 ANITA P. ARRIOLA, ESQ.  
18 *Attorney for Plaintiff and*  
19 *Proposed Intervenors*  
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1 **CERTIFICATE OF SERVICE**

2 I, Anita P. Arriola, declare under penalty of perjury that on March 8, 2023, I caused the  
3 foregoing document to be electronically filed with the Clerk of the Court for the United States  
4 District Court of Guam, and to be served upon registered parties, using the CM/ECF system.

5 Defendant Arthur U. San Agustin has been served via hand-delivery, as well as via service  
6 to Leslie A. Travis, attorney for Defendant Governor Guerrero, who I understand Mr. Agustin  
7 has agreed may accept service in this matter on his behalf.

8  
9 Executed this 8<sup>th</sup> day of March, 2023

10 By: /s/ Anita P. Arriola  
11 Anita P. Arriola, Esq.  
12 *Attorney for Plaintiff and*  
13 *Proposed Intervenors*  
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