

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-840

INTERNATIONAL PARTNERS FOR ETHICAL CARE, INC.,
ET AL., PETITIONERS

v.

BOB FERGUSON, GOVERNOR OF WASHINGTON, ET AL.

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

MOTION OF THE UNITED STATES FOR LEAVE TO
PARTICIPATE IN ORAL ARGUMENT AS AMICUS CURIAE
AND FOR DIVIDED ARGUMENT

Pursuant to Rules 28.4 and 28.7 of the Rules of this Court, the Solicitor General, on behalf of the United States, respectfully moves for leave to participate in the oral argument in this case as amicus curiae supporting petitioners and requests that the United States be allowed ten minutes of argument time. Petitioners consent to this motion and have agreed to cede ten minutes of argument time to the United States. Accordingly, if this motion is granted, the argument time would be divided as follows: 20 minutes for petitioners, 10 minutes for the United States, and 30 minutes for respondents.

This case concerns whether parents who object to a scheme that displaces their control over the medical care their child may access have standing to challenge such a scheme. The United States has filed a brief as amicus curiae supporting petitioners, arguing that as soon as a State restricts parents' control over the medical care their child may access, objecting parents have standing to contest that change.

The United States has significant interests in this case. It has a strong interest in protecting the rights of parents over the care, custody, and control of their children -- including with respect to what medical care those children may have access to or receive. It also has a strong interest in ensuring that proper parties can sue to enforce those parental rights, and that improper parties cannot invoke the jurisdiction of the federal courts.

The United States has previously presented oral argument as amicus curiae in cases involving whether a plaintiff has standing to bring suit in federal court. See, e.g., Bost v. Illinois State Board of Elections, 607 U.S. 71 (2026); Uzuegbunam v. Preczewski, 592 U.S. 279 (2021); Thole v. U.S. Bank N.A., 590 U.S. 538 (2020); Susan B. Anthony List v. Driehaus, 573 U.S. 149 (2014). We therefore believe that participation by the United States in oral argument in this case would be of material assistance to the Court.

Respectfully submitted.

D. JOHN SAUER
Solicitor General
Counsel of Record

OCTOBER 2026