

Nos. 25A1207, 25A1208

Supreme Court of the United States

DANCO LABORATORIES, L.L.C., *et al.*

Applicants

v.

STATE OF LOUISIANA, *et al.*,

Respondents.

MOTION FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE

Amici Curiae Texas Values and State Representative Jeff Leach respectfully moves for leave to file the accompanying brief in support of Respondents.

Texas Values is a nonprofit organization dedicated to protecting women, minors, parental rights, and unborn life through litigation, public policy advocacy, and legal education. *Amici* has substantial experience addressing state laws governing chemical-abortion distribution, interstate circumvention schemes, and protections against coercive and concealed abortions involving vulnerable minors.

Texas State Representative Jeff Leach is a member of the Texas Legislature serving Texas House District 67 and is the House authors of Texas House Bill 7, enacted during the 89th Legislature, Second Called Session (2025). Representative Leach seeks to preserve the sovereign authority of the State of Texas to safeguard women, minors, and unborn life from unlawful and harmful chemical-abortion distribution systems operating beyond traditional state enforcement mechanisms.

The accompanying brief offers a distinct perspective concerning the sovereign interests of States in preventing anonymous mail-order distribution of abortion-inducing drugs, particularly where such distribution systems facilitate coercion, concealment, and circumvention of state abortion prohibitions involving minors.

Due to the expedited nature of these proceedings, *amici* were unable to obtain consent from all parties before filing. *Amici* respectfully submits that the accompanying brief may assist the Court in evaluating the important federalism, sovereignty, and public-safety interests implicated by the application.

For these reasons, *amici* respectfully request that this Court grant leave to file the accompanying brief.

Respectfully submitted,

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