

No. 2023-000856

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**The Supreme Court of the State of South Carolina**

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PLANNED PARENTHOOD SOUTH ATLANTIC, ET AL.,  
RESPONDENTS,

v.

STATE OF SOUTH CAROLINA, ET AL.,  
APPELLANTS.

**RECEIVED**

**Jun 13 2023**

S.C. SUPREME COURT

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*APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS  
HON. CLIFTON NEWMAN, CIRCUIT COURT JUDGE*

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**UNOPPOSED MOTION OF AMERICAN COLLEGE OF PEDIATRICIANS  
FOR LEAVE TO FILE BRIEF AS *AMICUS CURIAE*  
IN SUPPORT OF APPELLANTS**

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Under South Carolina Appellate Court Rule 213, the American College of Pediatricians seeks the Court's leave to file an *amicus* brief in support of the Appellants in this case. A copy of the proposed brief is attached to this motion. The parties do not oppose this motion.

The American College of Pediatricians is a national organization of pediatricians and other health care professionals dedicated to the health and well-being of children. Formed in 2002, the College is committed to producing policy recommendations based on the best available research. The College currently has members in nearly all states. Of particular importance to the College is the sanctity of human life from conception to natural death. It has a significant interest in this action and regularly files *amicus* briefs in similar cases, including in *Dobbs v. Jackson Women's Health Organization*, 142 S. Ct. 2228 (2022), 2021 WL 3374498 (filed July 29, 2021) (cited by Reply Brief for Petitioners 16, *Dobbs*, 2021 WL 4845765 (filed Oct. 13, 2021)).

The proposed brief is relevant to this Court's consideration of the issues presented, as it explains how advancements in medical knowledge about fetal development bear on those issues. The proposed brief provides a unique perspective on the issues before the Court, as *amicus* provides scientific and medical expertise about fetal development. And the status of the unborn child is, of course, highly pertinent to the nature and scope of the Respondents' asserted right to elective

abortions. Thus, the Court should follow its ordinary practice and accept the *amicus* brief. See *Ex Parte Brown*, 393 S.C. 214, 225–26, 711 S.E.2d 899, 904–05 (2011); see also *Savannah Riverkeeper v. S.C. Dep’t of Health & Env’t Control*, 400 S.C. 196, 207, 733 S.E.2d 903, 909 (2012) (Kittredge, J., dissenting) (referring to the Court’s “standard practice of accepting amici briefs”).

For these reasons, this motion should be granted and the attached *amicus* brief filed.

Respectfully submitted,

s/ Christopher Mills

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