

**IN THE UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT**

LOUIS JERRY EDWARDS, et al

PLAINTIFFS/APPELLEES.

VS

NO. 14-1891

JOSEPH M. BECK, et al

DEFENDANTS/APPELLANTS

**MOTION SEEKING LEAVE TO FILE AMICUS BRIEF
IN SUPPORT OF EN BANC PETITION**

1. The provisions of Ark. Code Ann. §20-16-1304(a) & (b) and Ark. Code Ann. §20-16-1303(d)(3) are clear augmentations of *Roe v Wade* (1973), and conform with *Roe* very carefully after the two decades since *Casey*.
2. Neither party, including all citations used from the progeny of *Roe v Wade* by each party and each juror, addressed augmentation of the honorable *Roe v Wade* suggestion to protect “*important state interests in regulation*” besides the rights of the pregnant female and state duty to protect the “living cells” within.
3. No other interested parties have ever been before the courts in any of the progeny of *Roe v Wade* including this litigation by mistake. Every voter in Arkansas is now before the Eighth Circuit Court of Appeals and a plethora of interested parties besides the state and the parties of this case must not remain silent or be silenced herein.
4. This litigation is exceptionally important and will be nationally and internationally impacting. Curtis J. Neeley Jr. seeks leave to enter the attached *amicus* Brief in Support of the Appellant's Petition for En Banc Consideration

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Respectfully and humbly submitted,

s/ Curtis J Neeley Jr