

STATE OF MICHIGAN  
IN THE SUPREME COURT

MICHAEL T. ANDARY, M.D., Conservator  
and Guardian of ELLEN M. ANDARY, LIP,  
RONALD KRUEGER, Guardian of PHILIP  
KRUEGER, LIP, and MORIAH, INC., d/b/a  
EISENHOWER CENTER,

Plaintiffs-Appellees,

v

USAA CASUALTY INSURANCE  
COMPANY and CITIZENS INSURANCE  
COMPANY OF AMERICA,

Defendants-Appellants.

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SC No. 164772

COA No. 356487

Ingham CC No. 19-000738-CZ

**MOTION BY THE AMERICAN CIVIL LIBERTIES UNION OF MICHIGAN,  
DISABILITY RIGHTS MICHIGAN, DETROIT DISABILITY POWER, MICHIGAN  
STATEWIDE INDEPENDENT LIVING COUNCIL, LEGAL SERVICES ASSOCIATION  
OF MICHIGAN, AND MICHIGAN STATE PLANNING BODY FOR LEAVE TO FILE  
AMICUS CURIAE BRIEF**

By this motion, and pursuant to MCR 7.312(H), the American Civil Liberties Union of Michigan, Disability Rights Michigan, Detroit Disability Power, Michigan Statewide Independent Living Council, Legal Services Association of Michigan, and Michigan State Planning Body seek leave to file an amicus curiae brief in the above-captioned case.

In support of this motion, the proposed amici state as follows:

1. Amici are legal, advocacy, and social service organizations dedicated to achieving full equality under the law for people with disabilities, limited economic means, and other historically disadvantaged groups.

2. A brief description and statement of interest of each amicus organization is provided in their proposed brief.

3. Amici write to emphasize that the Legislature must speak clearly in order to retroactively apply a law to take away important services and benefits from a disadvantaged group. As explained in amici's brief, services and benefits such as post-accident health care are essential to facilitating Michiganders' lives and their equal citizenship, which the Michigan Constitution guarantees. Courts therefore cannot lightly infer that the Legislature snatched away such essential services and upended Michiganders' lives in the process.

4. The proposed amicus brief accompanies this motion.

For these reasons, the American Civil Liberties Union of Michigan, Disability Rights Michigan, Detroit Disability Power, Michigan Statewide Independent Living Council, Legal Services Association of Michigan, and Michigan State Planning Body request that this Court grant them leave to file an amicus curiae brief, and accept their accompanying brief as filed.

Respectfully submitted,

By: /s/ Daniel S. Korobkin

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