

**MAINE SUPREME JUDICIAL COURT  
SITTING AS THE LAW COURT**

STATE OF MAINE  
CUMBERLAND, ss.

ROBERT E. DUPUIS, et al.

*Plaintiffs-Appellees,*

v.

ROMAN CATHOLIC BISHOP OF  
PORTLAND

*Defendant-Appellant.*

Docket No. BCD-23-122

On Report from  
Business and Consumer Court  
Location: Portland  
Docket No. BCD-CIV-2022-0044

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**CHILD USA’S MOTION FOR LEAVE TO PARTICIPATE IN ORAL  
ARGUMENT AS *AMICUS CURIAE* IN SUPPORT OF PLAINTIFFS-  
APPELLEES**

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Please take notice that, pursuant to Rule 7A(e)(1)(C) of the Maine Rules of Appellate Procedure, CHILD USA, through its attorney, Melissa Martin, Esq., hereby moves the Maine Supreme Judicial Court sitting as the Law Court for an Order granting them leave to participate in oral argument in the above-captioned matter in support of Plaintiffs-Appellees. CHILD USA requests that it be allotted up to 10 minutes of argument time taken from neither party or, in the alternative, to be

taken from Plaintiffs-Appellees. Counsel for Plaintiffs-Appellees has indicated that it consents to this motion. Oral argument is set for this above-captioned matter on November 9, 2023.

Amicus recognizes that motions for leave to participate in oral argument will only be granted for extraordinary reasons. Amicus believes that such circumstances are present here.

Amicus offers the following in support of its Motion:

- 1) There is good cause for CHILD USA’s participation in oral argument. CHILD USA is the leading organization in the United States to track and study child sex abuse statutes of limitations (“SOLs”) as part of its Sean P. McIlmail SOL Reform Institute. CHILD USA’s Founder, Professor Marci A. Hamilton, is the foremost constitutional law scholar on revival laws, and has advised Congress and state governors, legislatures, and courts on the constitutionality of revival laws for child sex abuse throughout the United States. CHILD USA has participated in oral arguments as amicus curiae at the state appellate and supreme court levels in similar cases where the constitutionality of a state revival window was at issue.
- 2) CHILD USA is uniquely positioned to provide this Court with current research and analysis regarding Maine’s revival law for sexual abuse claims, the compelling public interest in revival of expired civil SOLs, impacts of the

revival laws on public safety, the science of delayed disclosure by victims of their abuse, and the national landscape on revival laws for sexual abuse.

3) Therefore, CHILD USA requests this Court grant its Motion for Leave to participate in oral argument.

Respectfully submitted,

BY:

/s/ Melissa L. Martin Esq.

Melissa L. Martin Esq.

*Counsel of record*

Bar No. 5540

Maine Coalition Against Sexual Assault

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Dated: October 26, 2023

**CERTIFICATE OF SERVICE**

I, Melissa L. Martin, Esq., hereby certify that a copy of CHILD USA's Motion for Leave to Participate as Amicus Curiae in Oral Argument was served upon counsel at the address set forth below by email on October 26<sup>th</sup>, 2023:

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