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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

**THE STATE OF CALIFORNIA; THE
STATE OF DELAWARE; THE STATE OF
MARYLAND; THE STATE OF NEW
YORK; THE COMMONWEALTH OF
VIRGINIA,**

Plaintiffs,

v.

**ERIC D. HARGAN, IN HIS OFFICIAL
CAPACITY AS ACTING SECRETARY OF THE
U.S. DEPARTMENT OF HEALTH & HUMAN
SERVICES; U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES; R.
ALEXANDER ACOSTA, IN HIS OFFICIAL
CAPACITY AS SECRETARY OF THE U.S.
DEPARTMENT OF LABOR; U.S.
DEPARTMENT OF LABOR; STEVEN
MNUCHIN, IN HIS OFFICIAL CAPACITY AS
SECRETARY OF THE U.S. DEPARTMENT OF
THE TREASURY; U.S. DEPARTMENT OF
THE TREASURY; DOES 1-100,**

Defendants.

4:17-cv-05783-HSG

**DECLARATION OF SHARITA
GRUBERG IN SUPPORT OF THE
STATES' REPLY TO OPPOSITION TO
MOTION FOR PRELIMINARY
INJUNCTION**

ATTORNEYS FOR ADDITIONAL PLAINTIFFS

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* Pro hac vice application forthcoming

1 I, Sharita Gruberg, declare as follows:

2 1. I am Associate Director of the LGBT Research and Communications Project at the
3 Center for American Progress (CAP). I am a lawyer with five years of experience filing Freedom
4 of Information Act requests.

5 2. On May 31, 2017, CAP submitted a Freedom of Information Act (FOIA) request to
6 the U.S. Department of Health and Human Services for all records of religious accommodation
7 requests submitted to the agency under the Affordable Care Act's contraceptive mandate. Records
8 were requested from when the Affordable Care Act went into effect to the date the FOIA request
9 was submitted and included filings made by requesting entities as well as the agency's responses.

10 3. We received 558 pages of documents from January 2014 to March 2016 in response
11 to our request. A true and correct copy of these documents is attached as Exhibit A.

12 I declare under penalty of perjury that the foregoing is true and correct of my own personal
13 knowledge.

14 Executed on December 6, 2017 in Washington, D.C.

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Sharita Gruberg
Center for American Progress

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CERTIFICATE OF SERVICE

Case Name: St. of Ca. et. al v. Health & Human Services, et al. No: 4:17-cv-05783-HSG

I hereby certify that on December 6, 2017, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

Declaration of Sharita Gruberg in Support of the States' Reply to Opposition to Motion for Preliminary Injunction

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on December 6, 2017, at Sacramento, California.

Francina M. Stevenson

Declarant

/s/ Francina M. Stevenson

Signature