

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

PLANNED PARENTHOOD CENTER FOR
CHOICE, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

No. 1:20-cv-00323-LY

**NOTICE OF SUPPLEMENTAL FILING IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs hereby notify the Court of the supplemental filing of additional exhibits offered in support of Plaintiffs' Motion for a Preliminary Injunction (the "Motion"), Exhibits Nos. 11 to 19, attached hereto. Plaintiffs filed the Motion (along with a Motion for Temporary Restraining Order) on March 25, 2020, with Exhibits 1–9 in support. ECF No. 7. They subsequently filed a Supplemental Statement in Support of the Motion for a Temporary Restraining Order on March 30, 2020, with Exhibit 10 in support. ECF No. 29.

In their Motion for a Preliminary Injunction, Plaintiffs seek to enjoin Defendants' application of Texas Governor Greg Abbott's March 22, 2020, Executive Order GA 09 (the "Order") and the Texas Medical Board's emergency amendment to 22 Tex. Admin Code § 187.57 to abortion. Defendants have not yet responded to Plaintiffs' Motion for a Preliminary Injunction, and no deadline is currently set for further briefing. A hearing on that Motion is set for April 13, 2020.

The additional exhibits Plaintiffs now file in support of the Motion are as follows:

(a) declarations from public health professionals, Exhibits 11 to 12, supporting Plaintiffs' arguments in the Motion at pp. 22–25;

(b) declaration from an attorney representing minor patients seeking abortions, Exhibit 13, in support of Plaintiffs' arguments in the Motion at pp. 25–26;

(c) declarations from Plaintiffs' staff, Exhibits 14 to 15, in support of Plaintiffs' arguments in the Motion at pp. 17–26; and

(d) declarations from obstetricians/gynecologists and other physicians regarding health care for pregnant patients, use of personal protective equipment (PPE), and hospital capacity, Exhibits 16 to 19, supporting Plaintiffs' arguments in the Motion at pp. 17–25.

Dated: April 2, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this 2nd day of April, 2020, a true and correct copy of the foregoing was served electronically on all counsel of record via the Court's ECF system.

/s/ Julie Murray
Julie Murray