

Exhibit C

NO. _____

JEFFERSON CIRCUIT COURT
DIVISION _____ ()
JUDGE _____

EMW WOMEN'S SURGICAL CENTER, P.S.C., on behalf of itself, its staff, and its patients; **ERNEST MARSHALL, M.D.**, on behalf of himself and his patients; and **PLANNED PARENTHOOD GREAT NORTHWEST, HAWAII, ALASKA, INDIANA, AND KENTUCKY, INC.**, on behalf of itself, its staff, and its patients

PLAINTIFFS

v.

AFFIDAVIT OF PATIENT JANE DOE

DANIEL CAMERON, in his official capacity as Attorney General of the Commonwealth of Kentucky; **ERIC FRIEDLANDER**, in his official capacity as Secretary of Kentucky's Cabinet for Health and Family Services; **MICHAEL S. RODMAN**, in his official capacity as Executive Director of the Kentucky Board of Medical Licensure; and **THOMAS B. WINE**, in his official capacity as Commonwealth's Attorney for the 30th Judicial Circuit of Kentucky

DEFENDANTS

1. I am 36 years old. I currently live in Louisville, Kentucky, with my preschool-aged son. My husband, the father of my son, recently passed away.
2. I am employed as a teacher. My day-to-day life involves teaching and coordinating child care with my parents and in-laws so that I can go to work and my son can be properly cared for while I am working outside the home.
3. Roughly a year after my husband died, I learned I was pregnant by taking a home pregnancy test. I suspected that I might be pregnant because my period was late. However, I did not think it was very likely that I was pregnant, because it had taken a long time for me to become pregnant with my son.
4. While I have the financial resources to support another child, the man who got me pregnant (“A.”¹) and I did not feel that it was the right time for us to have a child together. We agreed that it was best to terminate the pregnancy, and A. supported my decision. I also did not think A. would be able to be meaningfully involved in the child’s life.
5. I further felt that having another child at this time would complicate life for my young son. I felt that it would deprive him of additional resources and would increase the logistical difficulties that I already face in arranging care for him.
6. With the help of a close friend, I found and contacted EMW Women’s Surgical Center (“EMW”). I was able to arrange an appointment roughly one week later.
7. My pregnancy was terminated at five weeks and six days. I had a medication abortion, and I experienced no physical discomfort or pain associated with the treatment.
8. This was the first time that I have ever terminated a pregnancy.

¹ For ease of reference and anonymity, I am using a pseudonymous first initial to refer to the man who got me pregnant.

9. When I scheduled my appointment with EMW, I felt immense relief that I could receive care so quickly.
10. After my abortion, I felt a mix of emotions, including relief. While I also felt and continue to feel sad, I am confident that I made the right choice for me and for my son.
11. When I looked around the clinic at EMW, I saw other women and imagined what they were going through. While that weighed on me, I was glad to know that they were able to also get access to care, and that I was not alone. I also felt fortunate knowing that I had the resources, support, and access to obtain the healthcare services that I needed.
12. While at EMW, I received excellent care and support from the doctors and staff. Every single person I interacted with was so kind; they made me feel safe and supported. I deeply appreciate all of the people who work at EMW. They are doing a really hard job and doing it very well.
13. I have always supported abortion rights, but going through the process of terminating my own pregnancy made me so much more aware of how critical those rights are. Seeking an abortion can be such a challenge for so many women, and the care they need is so vital.
14. I wish to remain anonymous because of the potential backlash that A. and I would face if people found out. I rely heavily on my parents in-law, and I fear they would be upset by this information and provide less help to my son. A. does not want information about my abortion to be public, and I fear that if my identity was released it would violate his privacy and interfere with his relationships as well.

