

Exhibit D

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 2**

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 live in Louisville, Kentucky, with my two daughters. I am 36 years old.
2. I work as a substance abuse counselor at a local treatment center. I have had this job for about a year now. Before that, I worked in mental health therapy for about six years. I have to be at work by 4:45 am, which requires me to go to bed by 8:30 pm and wake up by 4:00 am. I make about \$55,000 annually.
3. When my oldest daughter was young, I was a single parent for a few years. Her father was never involved. I met my youngest daughters' father, ("B."¹), and he and I had my youngest daughter together. He has been involved in both of their lives since and has helped me take care of both of them. While we are no longer in a relationship, B. remains involved in my life. B. is the man who got me pregnant.
4. I found out I was pregnant because I missed a period and began to experience some symptoms of pregnancy, including fatigue and breast tenderness. I took a test and learned I was pregnant.
5. When I realized I was pregnant, I began considering what to do. Initially, I was very scared because I worried that there wouldn't be any access to abortion in Kentucky and I wouldn't have any options. I was relieved when I learned that it was available in Kentucky so that it was something I could at least consider. I remembered being a single parent to a newborn with my first daughter, and how difficult that was. B. has been a good father, but I didn't want to force him to deal with the added burden of another child. Being a single parent was hard enough when it was only one baby, but this time I realized I would be responsible for taking care of my two daughters on top of an infant. A baby would also require a lot of money, which would take away from my ability to support my

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

two daughters.

6. I also knew I would have to get a new job if I had this baby. I do not think it would be possible or affordable to find childcare at 4:00 am every day that I went to work, and I do not have any family nearby who could help me.
7. I discussed the options for this pregnancy with B., and we both decided it would be best to terminate the pregnancy. We were both reluctant to make this decision. I never pictured myself getting an abortion, nor did he. But when we talked about all of the obstacles, we knew this was the right decision. He fully supported me in this choice.
8. I remembered that there was an abortion clinic in Louisville and looked it up online. I also had previously spoken with one friend who had gotten an abortion at EMW Women's Surgical Center ("EMW") a while back. I called EMW and they were helpful in explaining the process to me. EMW was also able to help me access financial aid, which reduced the cost by about 50%.
9. The staff at EMW was kind and therapeutic. I was about 8 weeks and 5 days pregnant on the day of my procedure. I had never terminated a pregnancy before and was glad I had the option to select a procedure instead of a medication abortion. After the procedure, I had some cramping and felt dizzy from the anesthesia, but otherwise physically felt fine.
10. I am still processing my grief over this circumstance, but I do not regret my choice. I know that it was right for me, for my two daughters, and for B.

Verification

Further affiant sayeth not. I have reviewed the facts contained in this affidavit and they are true and correct to the best of my knowledge.

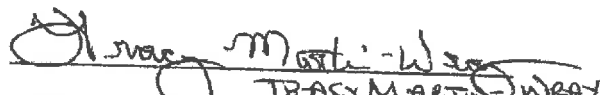


Jane Doe²

COMMONWEALTH OF KENTUCKY)

COUNTY OF JEFFERSON)

Subscribed, sworn and acknowledged before me by Jane Doe this 23rd day of June 2022.


NOTARY PUBLIC TRACY MARTIN SWABY

My commission expires: Oct 6, 2025

Commission number: KY/NP 35554



² Jane Doe is a pseudonym.