

Exhibit E

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 3**

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 a rural, tiny town in the far western part of the state. I previously lived in a different town in Kentucky, but I was forced to relocate after a major tornado destroyed my home in December 2021.
2. I currently reside with my parents in their home. I am a single mother; my two children, live with me and my parents.
3. I am 37 years old.
4. I work multiple jobs to support my children, and I receive no financial support from their fathers. I regularly have to wake up before 5 a.m. to leave for work, and just one of my jobs requires me to work between 50 and 60 hours each week.
5. I realized I was pregnant after an unusual period. My menstrual cycle is usually very regular, so it was a surprise to me when it started and then suddenly stopped. I took a home pregnancy test on Mother's Day, and it quickly came back positive.
6. The man who got me pregnant ("C."¹) and I are not in a relationship. When I called him to let him know that I was pregnant, he suggested that we wait a few days and that I test again at that point. I did so, and I went to his house to take another test. The second test came back with the same result as the first one.
7. C. and I discussed the options available to us. Initially, I did not even consider having an abortion. However, neither one of us is in a position where we felt having a child together was possible, either financially, physically, or emotionally.
8. While my first pregnancy in my 20s was relatively easy, my second pregnancy five years ago took a major toll on my physical health. At age 32, it took me months to recover. I was worried that a third pregnancy at age 37 would be even harder on my body.

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

9. I knew that I was of an “advanced maternal age,” meaning that I would have been required to receive extra medical attention and care throughout the course of my pregnancy. Even setting aside the physical risks associated with having another child at my age, I knew that I would not be able to reliably make it to important doctor’s appointments with my work schedule, especially because I only started my primary job a few months ago and my ability to take time off is still very limited.
10. Finally, I knew that I would face major financial hardships that would impact me and my two children if I had a newborn to care for. My work schedule would not allow me to care for a newborn. I am still working on rebuilding my life after my home was destroyed last December, and the costs associated with having another child would set me and my children back significantly on the path to rebuilding. And while my parents (who are in their 60s and 70s) are doing okay with me and my two children in the house, adding a newborn would be very hard on them. There are limited housing options available in my town right now due to the tornado damage, so it would be very difficult for me to find a place to move, even if I could afford one.
11. When we talked about the pregnancy and our options, C. brought up abortion. He is in his 40s and has no children of his own; he has never wanted to have children. I did not think he would want to be involved with raising a child, and he would not be able to contribute anything financially. I agreed with him that having an abortion was the best choice. He was very supportive of my decision. He offered to help pay for the treatment and to help me get the care I needed.
12. Where I live, no one ever talks about abortion. There is so much judgment in this part of the state; people are generally very religious and judgmental if anyone elects to terminate

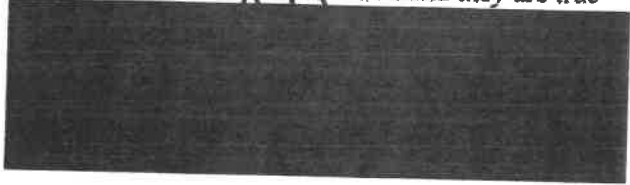
a pregnancy. That extends to medical providers as well; I did not feel that I could even go to see my OBGYN to discuss my pregnancy because I knew that I would not be treated with respect. I want to submit this statement anonymously because if my parents or other people in my community found out I had an abortion, I worry that they would no longer give me the help I need.

13. Rather than rely on medical providers in my area, I traveled to Louisville, Kentucky to receive care at EMW Women's Surgical Center ("EMW"). I would have been able to get care the same week that I called to make an appointment, but I had to wait another week to accommodate my work schedule. I wanted to go as soon as possible because I wanted to get a medication abortion.
14. C. and I had to travel three and a half hours by car to Louisville. We left at 3 a.m. to make the drive. We did not tell anyone where we were really going. To this day, no one knows about the abortion except the two of us.
15. The care I received at EMW was exceptional. Every single person was caring, thoughtful, and non-judgmental. While C. wasn't able to come into the treatment room with me, they told me that I could text him about the information they were giving to me. I've never felt so safe and cared for during a medical procedure. For me, even though I was going through something I've never been through, it was the most calming medical procedure experience I've ever had. I thought everyone was so sweet. The staff told me there was a hotline I could call at any time with questions or worries. The counselor gave me her personal number and told me to call if I needed anything. When people heard I was from my hometown, they asked me about how I was holding up after the tornado, and I could tell they really cared.

16. I ended up terminating my pregnancy at about seven weeks. I had a medication abortion and I went to C.'s house two days later so that he could be with me and support me through the process. Several days later, I felt much better.
17. I love my children and am very grateful to have them. But being a single mother is hard; I have to be both the good parent and the tough parent, I have to be the sole provider, and—since I don't have a lot of family support—I don't have anyone to really rely on. With this pregnancy, I had to make an extremely tough decision. I don't know what I would have done without abortion access, but I do know that I couldn't be a good mother to a newborn right now.
18. I had never thought about this before my own experience, but I realize now that if we took the right to abortion away from women, they will resort to desperate things to get access. Many people in my community view abortion as evil, but what I feel they don't recognize is that it is necessary to make abortion accessible and safe. If it isn't available, there will be desperate people who find potentially dangerous ways to get the same result, and it will hurt people. What struck me most at EMW was seeing the young women in the waiting room. I cannot imagine being their age and facing this situation. They needed this care and I am so glad they found a safe place like EMW. And while there will always be people who see evil in the world, whether it's abortion or alcohol or cigarettes or something else entirely, people deserve the ability to make their own choices. I hope that by sharing my story, I can help people understand that.

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

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Subscribed, sworn and acknowledged before me by Jane Doe this 21st day of June 2022.

Theresa Martin-Wray
NOTARY PUBLIC
THERESA MARTIN-WRAY

My commission expires: Oct 6, 2025

Commission number: KYNP35654

² Jane Doe is a pseudonym.