

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE**

PLANNED PARENTHOOD GREAT  
NORTHWEST, HAWAI'I, ALASKA,  
INDIANA, KENTUCKY, a Washington  
corporation,

Plaintiff,

v.

STATE OF ALASKA; et al.,

Defendants.

Case No.: 3AN-19-11710 CI

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**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Planned Parenthood Great Northwest, Hawai'i, Alaska, Indiana, Kentucky moves, pursuant to Alaska Rules of Civil Procedure 65 and 77, for a Preliminary Injunction barring enforcement of the Alaska statute prohibiting advanced practice clinicians ("APCs") from providing medication abortion. Plaintiff uses the term "APC Ban" here to refer, narrowly, to that prohibition.

Plaintiff seeks a limited preliminary injunction on the ground that it is likely to succeed on the merits of its claim that the APC Ban violates its patients' rights to privacy and equal protection under the Alaska Constitution. Alternatively, the balance of harms favors Plaintiff and its patients, and Plaintiff raises substantial and serious constitutional questions.

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This motion is supported by Plaintiff's Memorandum of Law in Support of a Limited Preliminary Injunction, and the affidavits of Amy Bender, N.P.; Tanya Pasternack, M.D.; Mark Nichols, M.D.; Joanne Spetz, Ph.D.; and Jill D. Bowman.

A Proposed Order granting the Preliminary Injunction accompanies this motion.

Dated this 21st day of June 2021.

STOEL RIVES LLP

By: /s/ Shannon M. Bleicher  
Shannon M. Bleicher (Bar No. 1910081)  
Veronica M. Keithley (Bar No. 1411100)  
Jill D. Bowman, *pro hac vice*

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By: /s/ Jahna M. Lindemuth  
Jahna M. Lindemuth (Bar No. 9711068)

PLANNED PARENTHOOD GREAT  
NORTHWEST, HAWAI'I, ALASKA,  
INDIANA, KENTUCKY

By: /s/ Hannah Brass Greer  
Hannah Brass Greer, *pro hac vice*

PLANNED PARENTHOOD FEDERATION  
OF AMERICA

By: /s/ Alice Clapman  
Alice Clapman, *pro hac vice*

LEGAL VOICE  
By: /s/ Kim C. Clark  
Kim C. Clark, *pro hac vice*

Attorneys for Plaintiff Planned Parenthood  
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CERTIFICATE OF SERVICE

This certifies that on June 21, 2021, a copy of the foregoing was served via email on:

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