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**IN THE SUPREME COURT OF THE STATE OF IDAHO**

PLANNED PARENTHOOD OF THE GREAT  
NORTHWEST, HAWAII, ALASKA,  
INDIANA, KENTUCKY, on behalf of itself, its  
staff, physicians and patients, and Caitlin  
Gustafson, M.D., on behalf of herself and her  
patients,

Petitioners,

v.

STATE OF IDAHO,

Respondent.

and

SCOTT BEDKE, in his official capacity as  
Speaker of the House of Representatives of the  
State of Idaho; CHUCK WINDER, in his  
official capacity as President Pro Tempore of  
the Idaho State Senate; and the SIXTY-SIXTH  
IDAHO LEGISLATURE,

Intervenors-Respondents.

Docket No. 49615-2022

**MOTION TO STRIKE PORTIONS  
OF THE DECLARATIONS OF  
KRISTINE SMITH AND DR.  
CAITLIN GUSTAFSON**

COMES NOW RESPONDENT the State of Idaho, by and through its counsel, and hereby submits this Motion to Strike Portions of the Declarations of Kristine Smith and Dr. Caitlin Gustafson. These declarations are appended to Petitioners' Brief in Support of Verified Petition for Writ of Prohibition and Application for Declaratory Judgment as Exhibits 3 and 4, respectively. The specific grounds for striking certain paragraphs in the declarations are set forth in the accompanying memorandum, but in summary, Respondent requests that the speculative and inadmissible claims in paragraphs 4, 5, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, and 26 of the declaration of Kristine Smith, and in paragraphs 4, 9, 10, 17, 18, 19, 20, 24, 25, 26, and 29 of the declaration of Dr. Caitlin Gustafson, be stricken. This motion is supported by the memorandum filed herewith.

DATED: April 28, 2022.

STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Megan A. Larrondo  
MEGAN A. LARRONDO,  
Deputy Attorney General

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28th day of April, 2022, I electronically filed the foregoing with the Clerk of the Court using the iCourt e-file system which sent a Notice of Electronic Filing to the following persons:

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*/s/ Megan A. Larrondo*

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