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*Attorneys for Respondents*

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

PLANNED PARENTHOOD 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; BRAD LITTLE, in his  
official capacity as Governor of the State of  
Idaho; LAWRENCE WASDEN, in his official  
capacity as Attorney General of the State of  
Idaho; JAN M. BENNETTS, in her official  
capacity as Ada County Prosecuting Attorney;  
GRANT P. LOEBS, in his official capacity as  
Twin Falls County Prosecuting Attorney;  
IDAHO STATE BOARD OF MEDICINE;  
IDAHO STATE BOARD OF NURSING; and  
IDAHO STATE BOARD OF PHARMACY,

Respondents,

and

SCOTT BEDKE, in his official capacity as  
Speaker of the House of Representatives of the

Docket No. 49899-2022

**STATE RESPONDENTS'  
MOTION TO STRIKE PORTIONS  
OF THE DECLARATION OF DR.  
CAITLIN GUSTAFSON**

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.

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State Respondents submit this Motion to Strike Portions of the Declaration of Dr. Caitlin Gustafson. This declaration is appended to Petitioners' Brief in Support of Verified Petition for Writ of Prohibition and Application for Declaratory Judgment as Exhibit 1. The specific grounds for striking certain paragraphs in the declaration are set forth in the accompanying memorandum, but in summary, State Respondents request that the speculative and inadmissible claims in paragraphs 6, 9, 10, 11, 13, 14, 15, and 16 of the declaration of Dr. Caitlin Gustafson, be stricken. This motion is supported by the memorandum filed herewith.

DATED this 2nd day of September 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 2nd day of September 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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