

**IN THE U.S. DISTRICT COURT FOR THE  
EASTERN DISTRICT OF ARKANSAS**

PLANNED PARENTHOOD ARKANSAS  
& EASTERN OKLAHOMA, d/b/a  
PLANNED PARENTHOOD OF THE  
HEARTLAND; JANE DOE #1; JANE DOE  
#2; and JANE DOE #3,

Plaintiffs,

v.

JOHN SELIG, Director, Arkansas  
Department of Human Services,

Defendant.

No.

**DECLARATION OF JANE DOE #3 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING  
ORDER AND/OR PRELIMINARY INJUNCTION**

Jane Doe #3 declares the following:

1. I am twenty-six years old and live in Little Rock. I am a patient at Planned Parenthood's Little Rock health center.
2. I have a two-year-old son. I work for a family business with my mom and step-dad; however, the business is not able to provide health insurance. For that reason, I am insured through Medicaid.
3. I have been a patient at Planned Parenthood's Little Rock health center for about four years. I rely on Planned Parenthood for my annual physical, breast exams, and birth control. Currently I am using hormonal contraception, which I need both for birth control and for help with my severe cramps and history of ovarian cysts. Planned Parenthood helped me find this solution, and it has worked very well for me.

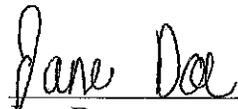
4. I like getting these services at Planned Parenthood because they specialize in reproductive healthcare, and I trust the information and advice I get there. They treat me like family; they are sweet and down-to-earth. The location is also very convenient for me – it is close to where I live, and right off of the Interstate. Also, there is never a long wait at the health center.

5. I enrolled in the Medicaid program specifically to get good access to birth control. My fiancé and I don't want any more children right now, so this is a high priority for us. Planned Parenthood is my only medical provider; I don't have a general physician.

6. If I could no longer get reproductive health services at Planned Parenthood, I do not know where I would go or what I would do. I would need to find a new provider very quickly who accepts Medicaid and offers the services I need, and I worry that there would be an interruption in my care while I try to find one.

7. I want to continue to get my care at Planned Parenthood, but if they could no longer accept Medicaid I could not afford to pay for these services out of pocket. Before I was enrolled in Medicaid I could not afford a physical, pap smear, or breast exam, so I just got birth control. However, I know that regular exams are important for my health, and I want to continue to get them.

8. I declare under penalty of perjury that the foregoing is true and correct.

  
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Jane Doe

Dated: September 9, 2015