

# EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

FREDERICK W. HOPKINS, M.D., M.P.H. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 4:17-cv-00404-KGB
	)	
v.	)	
	)	
LARRY JEGLEY <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF PATIENT JANE DOE 1 IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION AND/OR  
TRO**

I, Jane Doe 1,<sup>1</sup> declare and state:

1. I am 26 years old and a resident of the State of Arkansas.
2. In September 2020, I went to Little Rock Family Planning (“LRFP”) to obtain an abortion, when I was approximately 4 weeks pregnant. I understand that the clinic is opposing laws that could force a patient at LRFP to inform their partner that they are seeking an abortion, and would require the clinic to get a patient’s medical records from her previous doctors before the patient can have an abortion. While I was able to obtain an abortion without substantial delay because these laws are not in effect, I am worried that the State’s laws would make it more difficult, or impossible, for other women to get an abortion.
3. I was pregnant once before, with my daughter, who is now 3 years old. I love my daughter very much, but my pregnancy was difficult. I was often sick during the pregnancy, and suffered from severe anemia. During her delivery, I lost a lot of blood and required an emergency blood transfusion to survive. My mother, who is a Jehovah’s Witness, had to make the difficult decision whether or not to permit the blood transfusion, and was faced with the impossible question of choosing to save my life or my daughter’s life. Fortunately, my daughter and I both survived. But the experience was frightening and painful, and my recovery was likewise difficult, requiring a visit from a social worker to make sure that I would be able to care for my newborn daughter.

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<sup>1</sup> Jane Doe 1 is a pseudonym. A motion to file a pseudonymous declaration and brief in support are forthcoming.

4. After that experience, I knew that I did not want to experience another pregnancy, and knew that I did not want a second child. I asked my OBGYN at the time to tie my tubes to ensure that I would not become pregnant again, but he refused. He said that he would only do the procedure if I were 26, or had the permission and consent of my husband. Since I am not married, and was 23 at the time, I could not get the procedure. Instead, I started using NuvaRing, a hormonal form of birth control.
5. At the end of August, I started feeling sick, experiencing hot flashes, diarrhea, and other symptoms. At first, I was worried that I contracted COVID-19. However, before going to the hospital, I decided to take a pregnancy test. While I consistently use birth control, I know that no method of birth control is 100 percent effective, and I thought I should take a test before going to the emergency room. I was very surprised to see that my test was positive. When I got my results back from the pregnancy test, I took a few days to think about what to do, and decided to terminate the pregnancy. I do not want a second child, and am terrified about what a second pregnancy would do to my physical health. If I didn't survive a second delivery, I wouldn't be able to care for the daughter I already have.
6. I told my partner about the pregnancy, and he supported my decision to terminate the pregnancy. While it was important to me to let him know that I was pregnant, I felt strongly that what to do with the pregnancy was my decision. It is my body, and my choice. Men are not required to carry the pregnancy to term, and too often, men are not involved with raising or supporting the child financially after birth. Therefore, I do not believe that women should be required to obtain their partner's permission before seeking an abortion.
7. I would have been frightened and intimidated if I could not have had an abortion unless the clinic first requested medical records from my prior doctors. That would be a huge invasion of my privacy. Seeking an abortion is a private decision, and I do not think it is necessary or appropriate to inform all of my previous doctors of my decision. That is especially true in Arkansas, where so many people, including doctors, are hostile to women's rights to terminate a pregnancy. I am concerned that if I had to contact my prior physician, information my abortion would leak into my community, especially because I went to college with my prior doctor's daughter.
8. Obtaining all prior medical records would also take additional time, and I am worried about the emotional and physical toll that delaying an abortion could place on women. Delaying the abortion could have put my body at risk for more complications, as with my last pregnancy. It would have been emotionally stressful as well, because it was important to me to terminate the pregnancy as soon as possible after I made up my mind that an abortion was the right thing for me and my family.
9. Now that I've had the procedure, I no longer have to worry about whether the pregnancy would put my health in jeopardy again. It is a huge sigh of relief for me. I chose the right thing for me and my daughter.

10. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of under the laws of the United States of America that the foregoing is true and correct.

Executed on October 29, 2020

*./s/ Jane Doe 1*  
Jane Doe 1

# EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

FREDERICK W. HOPKINS, M.D., M.P.H. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 4:17-cv-00404-KGB
	)	
v.	)	
	)	
LARRY JEGLEY <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF PATIENT JANE DOE 2 IN SUPPORT OF PLAINTIFFS’  
MOTION FOR A PRELIMINARY INJUNCTION AND/OR TRO**

I, Jane Doe 2,<sup>1</sup> declare and state:

1. I am 22 years old and a resident of the State of Tennessee.
2. I had an abortion on October 10, 2020 at Little Rock Family Planning Services (“LRFP”) when I was 14.3 weeks pregnant.
3. I currently live at home with my parents and brother. Aside from us, my parents have two other children. Although I try to help my parents with the bills, we struggle financially and are in poverty. I only make \$13.50 an hour working full-time as a security guard, and all of that money goes to bills.
4. Although I graduated with an associate’s degree, it is still very hard to find a decent job. My job would only have held my position for a 2-week maternity leave, which would have made it very difficult if I had to stay pregnant.
5. Besides money, my home life is not stable. My brother is in legal trouble and going to court, and my parents are constantly watching over him and dealing with his issues. I knew that this was not a good environment to bring a child into, especially when I am still financially unstable. I want to break the generational curse of my family, and not bring a child into an environment where he or she would pick up bad habits.

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<sup>1</sup> Jane Doe 2 is a pseudonym. A motion to file a pseudonymous declaration and brief in support are forthcoming.

6. In addition, I do not have a current relationship with the individual who got me pregnant, and he made clear to me that he would not be present in our child's life if I carried the pregnancy to term. He even blocked my phone number so that I couldn't contact him. I didn't want to have to explain to a child one day that their biological dad didn't want them.
7. I want to focus on becoming financially stable. Besides working full-time as a security officer, I am also working hard to start my own business in real estate. My brother-in-law works in real estate buying, renovating, and selling houses, and I am learning the business from him. I also want to learn how to sign deals and sell homes to investors so that I can be financially stable and take care of myself and help my family.
8. My parents tried to force me to continue the pregnancy, even though our home is not a good environment for a child. I had to sneak away and drive to LRFP myself, which is about two and a half hours from me. The second time when I went for the actual procedure, my best friend, who supported my decision, came with me.
9. I didn't have the money to actually get the abortion, but I was able to get financial assistance which brought the cost down to \$560. It also cost me about \$100 to get to LRFP and back two times. I had to use my credit card for those expenses because I am already flooded with bills.
10. If LRFP had to delay my procedure to comply with state laws, it would have been an even greater financial burden, because the procedures cost more later in pregnancy. I also think it's important to be able to get an abortion as soon as possible because I know that reduces the risk of anything going wrong. I know that the farther along you are, the higher the risk is.
11. I did not consult any other medical providers about this pregnancy because I believed my OBGYN would have a negative reaction and not support my decision. For this reason, I would feel extremely stressed and anxious if the State forced LRFP to seek medical records from my other providers before I could get the abortion. I made a final medical decision for myself, and don't understand why other medical providers need to be involved.
12. Similarly, I feel strongly that a woman's partner should not be contacted if she chooses an abortion. It is a personal matter, and if she has made the decision for herself, I do not feel that the partner should be notified. I'm not sure we would have even been able to contact the person who got me pregnant in order to get his consent because he had blocked me from being able to contact him. Aside from my personal situation, I believe that whether to have an abortion and how to tell a partner is the woman's decision to make for herself.

13. I have a lot of negativity coming at me from my family and others in my community because a lot of people are against abortions. But I feel that it is not their choice, their body, or their life.
14. Now that the procedure is over, I feel like 100 pounds have been lifted off my shoulders. The procedure went perfectly. I feel like I can now proceed with my life and try to break the cycle of my family's financial issues without having to worry about raising a child I'm not ready for. I'm even more motivated now to start my real estate business and stay focused.
15. I'm very thankful I had the option to get an abortion because I know a lot of women do not.
16. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 16, 2020

/s/ Jane Doe 2  
Jane Doe

# EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

FREDERICK W. HOPKINS, M.D., M.P.H. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 4:17-cv-00404-KGB
	)	
v.	)	
	)	
LARRY JEGLEY <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF PATIENT JANE DOE 3 IN SUPPORT OF PLAINTIFFS’  
MOTION FOR A SECOND PRELIMINARY INJUNCTION AND/OR TEMPORARY  
RESTRAINING ORDER**

I, Jane Doe 3,<sup>1</sup> declare and state:

1. I am 18 years old and a resident of the State of Arkansas.
2. At 16 years old, I had an abortion at Little Rock Family Planning (“LRFP”) when I was 14 weeks pregnant.
3. At that time, I lived in my rural hometown of about 600 people with my mother and step-father. I had dropped out of school and was working as a waitress. We lived in a secluded area, and we didn’t have enough money for many expenses.
4. When I got pregnant, I knew I needed to have an abortion. I could not afford to support a child, and I have never wanted to have kids.
5. I told my mother and my biological father that I was pregnant and wanted to have an abortion. Neither of them was supportive of my decision. Despite their disapproval, they provided parental consent so I could get the abortion.

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<sup>1</sup> Jane Doe 3 is a pseudonym. A motion to file a pseudonymous declaration and brief in support are forthcoming.

6. My boyfriend at the time was supportive of my decision to get an abortion. But we could not tell his parents about my pregnancy or the abortion because they are very religious and we were terrified of what they would do if they found out. My boyfriend and I were really scared that his parents would beat him up or kick him out of the house if they knew.
7. If the clinic were required to tell the local police about my abortion, I would feel uncomfortable and disgusted. There is no reason for them to know. This is especially concerning for me because I have family members on the local police force. I fear that they would disown me if they knew about my abortion. Even if it were meant to be kept confidential, it is a small community and the fact that I had an abortion would get around.
8. If the State required that the tissue removed during the abortion be sent to the state crime lab labeled with my name, and disclosing my address and my boyfriend's name, I would feel very uncomfortable and would be worried that even more people would find out about my abortion.
9. I probably would not have gotten an abortion in Arkansas if notification to my boyfriend's parents or the local police were required. I likely would have tried to travel out of state to get the abortion. I couldn't afford this, so I would have to go without eating much for a week or two to be able to save up to travel.
10. Deciding who I should disclose my pregnancy and abortion to was my decision to make and no one else's. If I don't want someone to know about the abortion, that should be the end of it.
11. My hometown is very far away from the clinic and getting there was difficult.
12. I needed to take time off from work to travel there. I had no paid sick time and my employer pushed me for an explanation for why I could not be at work. If I had not explained, I would not have gotten the time off I needed to travel to the clinic. When I told my employer that I needed the time off to get an abortion, I was fired based on their religious objection to abortion.
13. When I got to the clinic, I was concerned about keeping the abortion confidential because people in my hometown are very judgmental, and Arkansas is not a very nice place for people who have abortions. I was relieved when the clinic told me they wouldn't release my information to anyone.
14. The procedure went well. I am thankful that I was able to get the abortion and that I did not have to worry about it being disclosed. After I had the abortion, I felt like I could move on with my life and I was able to obtain my GED.
15. I would like to remain anonymous in this case because I worry people would call me a murderer and try to hurt me if they knew I had an abortion.
16. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 10/28/2020

s/Jane Doe Patient #3  
Jane Doe Patient #3

# EXHIBIT 10

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

FREDERICK W. HOPKINS, M.D., M.P.H. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 4:17-cv-00404-KGB
	)	
v.	)	
	)	
LARRY JEGLEY <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF PATIENT JANE DOE 4 IN SUPPORT OF PLAINTIFFS’ MOTION  
FOR A SECOND PRELIMINARY INJUNCTION AND/OR  
TEMPORARY RESTRAINING ORDER**

I, Jane Doe 4,<sup>1</sup> declare and state:

1. I am 37 years old and a resident of the State of Tennessee.
2. My husband and I have a 2 ½ year old son, who we were able to conceive using in vitro fertilization. In the summer of 2020, we were surprised and excited to find out that I had become pregnant without assistance. We were thrilled to have another child on the way.
3. At eleven weeks pregnant I got a blood test, which indicated that there was a risk of a fetal anomaly. We were relieved when everything seemed ok on the ultrasound around 13 weeks. Unfortunately, a couple weeks later, we received a devastating and grim diagnosis: our baby had Trisomy 18, which is a life-threatening disorder. Even if I could carry the pregnancy to term, my baby would have had a short and painful life.
4. We were so distressed because we wanted this baby, but he wasn’t going to live. Once the diagnosis was confirmed, we knew that having an abortion was the right thing to do for our family.
5. I first went to a clinic in Memphis to have the abortion. When I told the doctor that I wanted to terminate due to a fetal diagnosis, I was turned away over confusion about a

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<sup>1</sup> Jane Doe 4 is a pseudonym. A motion to file a pseudonymous declaration and brief in support are forthcoming.

Tennessee law that recently took effect, and that prohibits abortion after a diagnosis of fetal Down syndrome (which is different than Trisomy 18).

6. I felt devastation all over again. I was pregnant with a sick baby who could die from the anomalies at any moment and I was being forced to remain pregnant.
7. Nowhere else in Tennessee could provide me with an abortion because of how far along I was in pregnancy. Luckily, I was referred to Little Rock Family Planning Services (“LRFP”) in Little Rock, Arkansas.
8. Little Rock is about two and a half hours from our home in Tennessee. In order to travel to the appointments, my husband and I had to take time off of work and make childcare arrangements. I made the round trip once for the consent process, and then travelled again for the procedure itself. It was a two-day procedure, so I also had to pay for an overnight stay in a hotel on my second trip to Little Rock.
9. Before I got the abortion, I was scared that I would not be able to access the care I needed in Arkansas because I had already been turned away in Tennessee. I went to LRFP the week of December 14th, and they told me that new Arkansas laws were about to go into effect, which could prevent me from having my second-trimester abortion procedure. Luckily, I was able to have my procedure on December 19, 2020, just before the Arkansas laws would take effect.
10. If I hadn’t been able to get the abortion because of the new laws, it would have been torture. I had already waited nearly six weeks since receiving the diagnosis, and any further delay would push me beyond the gestational age limit to have an abortion in Arkansas. I am not sure what I would have done, or if there is another place I could go to get an abortion. I may have had to remain pregnant, and give birth to a baby that would shortly die. This would have been horrible for both my mental and physical health.
11. I feel fortunate that the Arkansas laws did not yet go into effect, and I was finally able to get the abortion I needed.
12. I feel a lot of relief now that this ordeal is over. But if these laws go into effect, I know there are others like me who would not be able to access the care they need.
13. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of under the laws of the United States of America that the foregoing is true and correct.

Executed on: Dec. 20, 2020

s/Jane Doe  
Jane Doe 4

# EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

FREDERICK W. HOPKINS, M.D., M.P.H. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No. 4:17-cv-00404-KGB
	)	
v.	)	
	)	
LARRY JEGLEY <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF PATIENT JANE DOE 5 IN SUPPORT OF PLAINTIFFS’ MOTION  
FOR A SECOND PRELIMINARY INJUNCTION AND/OR  
TEMPORARY RESTRAINING ORDER**

I, Jane Doe,<sup>1</sup> declare and state:

1. I am 32 years old and a resident of the State of Arkansas.
2. On December 19, 2020, I had a procedural abortion at Little Rock Family Planning (“LRFP”). I was about 6 weeks pregnant at the time.
3. I currently live with my boyfriend in a camper on his parents’ property. My boyfriend and I moved to Arkansas from Mississippi after my boyfriend lost his job due to the COVID-19 epidemic. Without his income, we could not afford to stay in Mississippi. Fortunately, his parents had a place for us to stay while we try and save up some money.
4. I am a Stage 3 breast cancer survivor, and I was concerned about the effect the pregnancy would have on my health. The pregnancy caused me to feel fatigued and lethargic. Going to the grocery store, or even walking to the bathroom, takes every bit of my energy and leaves me short of breath. I also experienced severe pregnancy symptoms like sickness and confusion. It did not feel safe to drive a car, because the confusion made it difficult to think quickly. I was concerned that if the pregnancy continued, I would not have been able to physically take care of myself, or work for much longer. In addition, as a breast cancer survivor, I was anxious about whether the hormones associated with my

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<sup>1</sup> Jane Doe 5 is a pseudonym. A motion to file a pseudonymous declaration and brief in support are forthcoming.

pregnancy would have an effect on my physical health, which led to additional stress. The COVID-19 pandemic already has me worried about my health, because I do not know how my immune system would react to the coronavirus.

5. If I had to wait longer to obtain the procedure that would have had a negative effect on my physical and mental health. I already had to wait three days because of the mandatory waiting period. I wish I could have just had the procedure done after one trip, instead of having to make two trips to the clinic after I made up my mind to have an abortion.
6. While my current boyfriend was supportive of my decision to have an abortion, that was not the case when I previously sought care from LRFP in 2014. At that time, my then-boyfriend was abusive and controlling. If the clinic had had to notify him about the procedure, he would have used that information to exert even further control over me. He would not have wanted me to get an abortion, and would have attempted to prevent me from having one. I would have had to try to travel out of state in order to avoid the requirement that the clinic notify him, even though I do not know how I would have been able to afford to do that. I barely had enough money to afford the procedure at the time, and the cost of traveling out of state would have been prohibitively expensive.
7. Concern for my health is partly why I chose to have a procedural abortion instead of a medication abortion. A medication abortion can have side effects, and I did not want to feel sick for any longer than necessary. I also did not want to have to return to the clinic for an ultrasound for a follow up appointment after the medication abortion.
8. Now that I have had the procedure, I feel better about my health. My pregnancy symptoms are already going away. The providers at LRFP were amazing. I have no regrets.
9. I would prefer not to use my real name for this declaration because I am concerned that individuals who are opposed to abortion would harass me.

Date: December 21, 2020

/s/ Jane Doe 5  
Jane Doe 5