

Julia E. Gabis & Associates
Attorneys at Law

Julia E. Gabis
Marilyn J. McHenry

Of Counsel
Mandy C. Rosenblum

April 23, 2012

**VIA FACSIMILE AND
CERTIFIED MAIL-RETURN RECEIPT REQUESTED
(717) 787-0191**

Anna Marie Sossong
Deputy Secretary for Quality Assurance
Department of Health
8th Floor West
Health & Welfare Building
7th and Forster Streets
Harrisburg, PA 17120

**Re: Revocation of the Registration of Rose Health Services Company in
Pittsburgh, PA; Facility ID 00058701**

Dear Ms. Sossong:

As you know, I represent Rose Health Services Company ("Rose"). I am writing in response to your letter and the Order dated April 17, 2012 directed to Steven C. Brigham, M.D., advising him that the Department of Health ("Department") has revoked the registration of Rose to operate a free-standing abortion facility at 320 Duquesne Blvd., Suite 325, Pittsburgh, PA. As I understand it from your letter and the Order, this unprecedented action was based on the alleged failure of Rose "to have a physician on site to perform abortions, resulting in its closure" which according to the Department constitutes an "infrastructure failure."

Please be advised that Rose has retained a physician who is able to be on site in the Pittsburgh office to provide abortions. Rose wishes to reopen its office, as it would have been able to do if the Department had not wrongfully revoked its registration. I request that the Department rescind the revocation immediately.

Anna Marie Sossong
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This letter should not be construed as an appeal of the revocation or an answer to the Order or an acceptance in any way of the Department's unlawful and unwarranted action. Please be assured that Rose will take whatever action(s) may be necessary to secure its constitutionally protected interests if the Department fails to rescind the revocation. I would appreciate your immediate response to this letter.

Sincerely yours,



Julia E. Gabis

cc: Rose Health Services Company
Audrey Miner, Esquire (via facsimile 717-705-6042)