

Exhibit 3

Declaration of June Ayers

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

WEST ALABAMA WOMEN'S CENTER, et al.,

Plaintiffs,

v.

DONALD E. WILLIAMSON, M.D., in his official
capacity as State Health Officer of the State of
Alabama,

Defendant.

CIVIL ACTION

Case No. _____

June Ayers declares and states the following:

1. I am the owner and Administrator of Reproductive Health Services ("RHS"), a clinic that has provided safe and legal abortion services to women from Alabama and neighboring states for more than 35 years. I have been both the owner and Administrator of RHS for the past 30 years.

2. RHS is the only licensed health center in Montgomery that offers abortion services. In addition to RHS, I am aware of just four other licensed abortion clinics in Alabama—West Alabama Women's Center in Tuscaloosa, Alabama Women's Center in Huntsville, and Planned Parenthood's health centers in Birmingham and Mobile.

3. I understand that at the beginning of 2015, West Alabama Women's Center stopped providing abortion services because its physician and medical director retired, and the clinic's new physician has been unable to secure either staff privileges at a local hospital or a contractual arrangement for outside covering physician services. I am not surprised by the difficulties West Alabama Women's Center has experienced, and in fact, that experience is very consistent with my own. In 1999 and 2003, I attempted to arrange for a covering physician for

RHS by contacting every OB/GYN in Montgomery, and I received nothing but negative responses due to physicians' opposition to abortion and/or fear of the repercussions of being affiliated with an abortion clinic.

4. At RHS, we provide abortion services up to 15.0 weeks in pregnancy, as measured from the woman's last menstrual period ("LMP"). In other words, we specialize in early abortions. Some women, however, require abortions at a later stage in pregnancy than we are able to offer at RHS. Until it stopped providing abortion services, West Alabama Women's Center was one of only two licensed abortion clinics in the state that provided abortion services throughout the second trimester; the only other provider of such services that I am aware of is Alabama Women's Center in Huntsville. West Alabama Women's Center was, by far, the closest provider of second-trimester abortion services to women in Montgomery—Tuscaloosa is 100 miles from Montgomery, while Huntsville is almost twice that distance.

5. In my experience over the four months since West Alabama Women's Center's closure, the unavailability of abortion services in Tuscaloosa has been harmful for women seeking abortions. Some of these women who previously would have been able to obtain services at West Alabama Women's Center have been able to travel to Montgomery in recent months, but many of these women have made clear to me that this increased travel imposed a real hardship on them and delayed their access to care. For example, this year, I have had many patients from the Tuscaloosa area who have made clear to me that they would have obtained an abortion earlier in the pregnancy if abortion services had been available in Tuscaloosa. For these women, the time, money, and logistics of coming to Montgomery delayed their ability to get the medical care they needed.

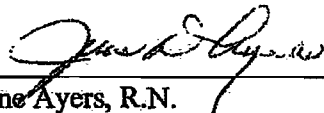
6. And of course, those are only the women who actually have managed to travel to Montgomery, and to do so in time to obtain an abortion before our gestational cutoff. Other women have not been able to do so. For example, since January 2015, RHS has experienced a significant increase in the number of calls from women seeking abortions after 15.0 weeks LMP as compared with the number of such calls over the same period last year; I would estimate that there has been an approximately 50% increase in the number of such calls that we have received since West Alabama Women's Center stopped providing abortion services than was the case when that clinic was open. And the number of women actually presenting to our clinic seeking abortions at a later stage in pregnancy than we are able to provide has been much higher in the first half of 2015 than was the case during this time last year—between January 1 and June 30 last year, 88 women past our gestational limit sought treatment at RHS; during the same period this year, that number has more than doubled to 201.

7. For women in need of second-trimester abortions who do not live in the northernmost part of the state—including women in the Montgomery area—the closure of West Alabama Women's Center imposes a tremendous burden. For example, before West Alabama Women's Center closed, I would generally have encouraged such women who call or present past our gestational cutoff to go to Tuscaloosa for later abortion services. Now, I must refer them to Huntsville, which is nearly 200 miles away, double the distance to Tuscaloosa. Over the last six months, when I have had to inform women that they would have to make the nearly 200-mile trip to Huntsville in order to obtain an abortion, most are shocked and many are utterly despondent, wondering aloud how they would be able to make that trip. These travel-related burdens impose the most serious obstacles to low-income women, who make up the majority of RHS's patients. Many of my poorer patients do not have access to a car, and even reaching a

clinic that is relatively close is a challenge. I have no idea how such women would travel nearly 200 miles to Huntsville. Thus, the closure of West Alabama Women's Center is causing real harm to women who have sought treatment at RHS by delaying their access to care and creating a very serious travel burden.

8. Since the closure of West Alabama Women's Center, RHS has expanded our abortion services. Between January 1 and June 30, 2015, we performed 761 abortions, compared to 513 abortions over the same period last year. But we are now operating at our maximum capacity, and I am concerned that the additional 248 women we were able to treat is a very small fraction of the gap created by West Alabama Women's Center's absence. Without the clinic in Tuscaloosa, I fear that women are not getting the safe, legal abortion care that they need, and that they may be forced to forego desired abortions altogether, or to take matters into their own hands by resorting to unsafe methods of attempted self-abortion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on July 9th, 2015 in Montgomery, Al.



June Ayers, R.N.