

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

COMPREHENSIVE HEALTH OF PLANNED )  
PARENTHOOD GREAT PLAINS, et al. )  
 )  
Plaintiffs, )  
 )  
v. ) Case No. 2:16-cv-04313-HFS  
 )  
DR. RANDALL WILLIAMS, in his official )  
capacity as Director of the Missouri )  
Department of Health and Senior Services, et al.)  
 )  
Defendants. )

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE EXHIBITS 1, 2, AND 3 TO THEIR  
SUPPLEMENTAL SUGGESTIONS IN SUPPORT OF MOTION FOR PRELIMINARY  
INJUNCTION UNDER SEAL**

Plaintiffs respectfully request leave to file Exhibits 1, 2, and 3 to their Supplemental Suggestions in Support of Motion for Preliminary Injunction under seal, pursuant to the Stipulated Protective Order in this action, ECF No. 71.

In response to a third-party subpoena issued by Defendants Hawley and Williams, the St. Louis Fire Department, Gateway Ambulance, and Abbott EMS have produced documents regarding ambulance runs that contain patient information, and have stamped those documents “confidential” pursuant to paragraph 2 of the Protective Order. Plaintiffs’ Exhibits 1, 2, and 3 contain those documents.

Per paragraph 13 of the Protective Order, materials designated “confidential” are required to be filed with the Court under seal. Therefore, Plaintiffs respectfully request permission to file Exhibits 1, 2, and 3 under seal.

Respectfully submitted,

ARTHUR BENSON & ASSOCIATES

*s/ Arthur A. Benson II*

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and

PLANNED PARENTHOOD FEDERATION OF  
AMERICA, INC.

*s/ Melissa A. Cohen*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2017 a copy of the foregoing has been served upon all counsel of record in this action by electronic service through the Court's CM/ECF system.

*/s/ Melissa A. Cohen*

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Melissa A. Cohen