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*\*Pro Hac Vice* motion pending  
Attorney for Defendant Ken Paxton

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

WHOLE WOMAN’S HEALTH; et al.,  
Plaintiffs,

vs.

KEN PAXTON, Attorney General of  
Texas; et al,  
Defendants.

MC Case No. 1:17-mc-00303

[Case No. 1:17-CV-00690-LY,  
Pending in the Western District of  
Texas Austin Division]

TRIAL DATE: None Set

**DEFENDANT KEN PAXTON’S MOTION TO FILE EXHIBITS TO RESPONSE TO  
JANE DOE, M.D.’S MOTION TO QUASH UNDER SEAL**

Defendant Ken Paxton, Attorney General of Texas (“Defendant Paxton”) files this Motion  
for Leave to File Exhibits Under Seal.

The exhibits attached hereto contain the true name of Dr. Doe, the person at the center of this Motion to Quash,<sup>1</sup> and/or have been designated as CONFIDENTIAL by the Plaintiffs in the underlying lawsuit.<sup>2</sup> Dr. Doe has requested that her name be kept under seal in this proceeding.

In good faith, Respondent respectfully requests an order from this Court granting Defendant's leave to file the Exhibits under seal.

DATED this 25th day of October, 2017.

/s/ James Hochberg  
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*Attorney For Respondent Ken Paxton*  
*\*Pro hac vice admission pending*

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<sup>1</sup> Attorney General Paxton does not concede that Dr. Doe is entitled to proceed in this or the matter before the Texas District Court under a pseudonym.

<sup>2</sup> Attorney General Paxton does not concede the confidentiality of these documents in this or the matter before the Texas District Court. The confidentiality of the documents has not been ruled upon by the Texas District Court.