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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.

MC Case No. 1:17-mc-00303

VS.

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

KEN PAXTON, Attorney General of Texas; et al,

TRIAL DATE: None Set

Defendants.

## Defendant Ken Paxton's Motion to File Exhibits 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>

Defendants respectfully request an order from this Court granting Defendants' leave to file the Exhibits listed above under seal.

DATED this 24th day of October, 2017.

OFFICE OF THE TEXAS ATTORNEY GENERAL

<u>/s/ Summer R. Lee</u>

SUMMER R. LEE\*
ATTORNEYS FOR RESPONDENT KEN
PAXTON

\*Pro hac vice motion pending

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served electronically through the Court's Electronic Court Filing notification system on this the 24th day of October, 2017, to:

Lisa Woods Munger Nicole Y. Altman Attorneys for Non-Party Jane Doe, M.D.

/s/ Summer R. Lee

SUMMER R. LEE

Assistant Attorney General

<sup>&</sup>lt;sup>1</sup> Attorney General Paxton files this Motion due only to the fact that Dr. Doe delayed to provide notice of her Motion to Quash until less than four hours before Paxton's the deadline to respond. 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.