

essential to PPSO's ability to provide the high-quality health care that it delivers to patients. Under the PPFA bylaws, PPSO is required to pay membership dues to PPFA.

38. PPSO brings this action on behalf of itself and its staff and patients.

39. Plaintiff Planned Parenthood Columbia Willamette ("PPCW") is a not-for-profit corporation organized under the laws of the State of Oregon. Its principal office is in Portland, Oregon. PPCW operates seven health centers in Oregon and Southwest Washington. All seven of PPCW's health centers participate in the Title X program.

40. Although PPCW is an independent organization, it is an affiliate of PPFA and has the right to use the Planned Parenthood name and service mark. PPCW's affiliation with PPFA is essential to PPCW's ability to provide the high-quality health care that it delivers to patients. Under the PPFA bylaws, PPCW is required to pay membership dues to PPFA.

41. PPCW brings this action on behalf of itself and its staff and patients.

42. PPFA, PPSO, PPCW, and all of PPFA's other affiliates are collectively referred to here as "Planned Parenthood."

43. Plaintiff Thomas N. Ewing is a board-certified family medicine doctor in Eugene, Oregon. He received his medical degree from Washington University School of Medicine in St. Louis, in 1983, and has been practicing medicine for more than 30 years. Dr. Ewing currently serves as the Vice President of Medical Services and Medical Director for PPSO. In his practice, Dr. Ewing sees Title X patients and, among other things, provides options counseling to pregnant women, including counseling on and referral for abortion. In addition, under his direction at PPSO, registered nurses and health care assistants provide options counseling for pregnant women, including counseling on and referral for abortion. Dr. Ewing is a member of the AMA, OMA, and American Academy of Family Physicians, among other associations.

44. Dr. Ewing brings this action on behalf of himself and his patients.

45. Plaintiff Michele P. Megregian is a certified nurse-midwife, specializing in midwifery care and general obstetric-gynecology care. She received both her B.S. in Nursing and graduate degree in Midwifery from Columbia University School of Nursing, in 1996 and 1997 respectively, and has practiced midwifery in a variety of settings, including public health clinics, community health centers, and hospital-based practices. Ms. Megregian previously served as a family planning clinician at PPCW and currently serves as a family planning clinician at PPSO. In her practice, Ms. Megregian sees Title X patients and, among other things, provides options counseling to pregnant women, including counseling on and referral for abortion. In addition, under her direction at PPSO, registered nurses and health care assistants provide options counseling for pregnant women.

46. Ms. Megregian brings this action on behalf of herself and her patients.

47. Plaintiffs have standing to assert the right of their patients or their members' or affiliates' patients because the Final Rule causes injury to Plaintiffs, there is a close relationship between Plaintiffs and their patients or members' or affiliates' patients, and patients face genuine obstacles to asserting their own rights, including because of privacy concerns.

48. Defendant United States Department of Health and Human Services ("HHS") is an agency of the United States government, located at 200 Independence Avenue, S.W., Washington, D.C. 20546. It is the federal agency responsible for, among other things, administering and regulating the family-planning program created by Title X of the Public Health Service Act.

49. Defendant Alex M. Azar II is the United States Secretary of Health and Human Services. He is sued in his official capacity.

50. Defendant Office of Population Affairs is the office within HHS that administers the Title X program.