

NATIONAL FAMILY PLANNING AND
REPRODUCTIVE HEALTH
ASSOCIATION; and PUBLIC HEALTH
SOLUTIONS,

Plaintiffs,

v.

ALEX M. AZAR II, *in his official capacity as
Secretary of the U.S. Department of Health
and Human Services*; U.S. DEPARTMENT
OF HEALTH AND HUMAN SERVICES;
ROGER SEVERINO, *in his official capacity
as Director of the Office for Civil Rights of the
U.S. Department of Health and Human
Services*; OFFICE FOR CIVIL RIGHTS of the
U.S. Department of Health and Human
Services,

Defendants.

No. 1:19-cv-05435-PAE
(consolidated with 1:19-cv-0476-PAE;
1:19-cv-05433-PAE)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated August 14, 2019; the accompanying Declarations of Dr. Regina Frost, Dr. David Stevens, and Erin Norman, all dated August 14, 2019; and such argument as may be received by this Court at the time of a hearing, Defendants-Intervenors Dr. Regina Frost and the Christian Medical and Dental Associations, by and through their undersigned counsel, move this Court before the Honorable Paul A. Engelmayer, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting summary judgment on all of Plaintiffs' claims in favor of Defendants-Intervenors pursuant to Federal Rule of Civil Procedure 56, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the July 16, 2019 Scheduling Order entered in this action, Dkt. No. 121, Plaintiffs' answering papers are to be filed and served on or before September 5, 2019, and Defendants-Intervenors' reply papers are to be filed and served on or before September 19, 2019.

Dated: August 14, 2019

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

/s/ Allyson N. Ho

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