

Appeal No. 20-15399

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

COUNTY OF SANTA CLARA, et al.,

Plaintiffs-Appellees,

v.

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, et al.,

Defendants-Appellants.

On Appeal from the United States District Court
for the Northern District of California
No. 2:19-cv-2916
The Honorable William H. Alsup

**NOTICE OF PERMANENT CESSATION OF BUSINESS ACTIVITIES
AND MOTION TO DISMISS
PLAINTIFF-APPELLEE TRUST WOMEN SEATTLE**

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Counsel for Plaintiff-Appellee Trust Women Seattle gives notice that Trust Women Seattle has permanently ceased operating, and its claims are now moot. *See San Lazaro Ass'n, Inc. v. Connell*, 286 F.3d 1088, 1096 (9th Cir. 2002) (holding that a plaintiff's claims became moot when it cancelled the license subject to the challenged action and could no longer benefit from any prospective relief). Accordingly, counsel moves this Court to dismiss Plaintiff-Appellee Trust Women Seattle.

The District Court awarded Judgment to Plaintiffs-Appellees under the Administrative Procedure Act, vacating the challenged regulation, "Protecting Statutory Conscience Rights in Health Care; Delegations of Authority," 84 Fed. Reg. 23,170 (2019). November 19, 2019 Order, Case No. 2:19-cv-2916-WHA, Dkt. No. 87, at 30-32. The dismissal of Trust Women Seattle, one of many healthcare provider plaintiffs in this case, will have no effect on the scope of the relief granted by the District Court or the Judgment granted to the remaining Plaintiffs-Appellees.

Respectfully submitted this 1st day of April, 2020,

/S/ Genevieve Scott

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CERTIFICATION OF COMPLIANCE

I hereby certify that the foregoing Motion complies with the type-volume limitation provided in Rule 27 of the Federal Rules of Appellate Procedure and Ninth Circuit Rule 27-1 because it contains 162 words and does not exceed 10 pages. The Motion also complies with the requirements of Rules 32(a)(5) and 32(a)(6) of the Federal Rules of Appellate Procedure because it is prepared in Times New Roman (14 pt) proportional type. Microsoft Word is the word-processing software that was used to prepare the brief.

/s/ Genevieve Scott

Genevieve Scott

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2020, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

Dated: April 1, 2020

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