

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION

JANE DOE 1, et al.,
Plaintiffs,

v.

WILLIAM C. THORNBURY, JR., M.D., in his
official capacity as the President of the
Kentucky Board of Medical Licensure, *et al.*,
Defendants.

Civil Action No. 3:23-cv-00230

Electronically filed

**RESPONSE TO PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTIVE RELIEF
BY DEFENDANT ERIC FRIEDLANDER IN HIS OFFICIAL CAPACITY AS
SECRETARY OF THE CABINET FOR HEALTH AND FAMILY SERVICES**

Defendant Eric Friedlander, in his official capacity as the Secretary of the Cabinet for Health and Family Services (“Secretary”), through counsel, states the following in response to Plaintiffs’ Motion for Preliminary Injunctive Relief.

The Cabinet for Health and Family Services licenses and regulates multiple health care facilities and providers through its Office of Inspector General (OIG). As such, Section 4 of Senate Bill 150 (R.S. 2023) would apply to the Cabinet, and provides: “If a licensing or certifying agency for health care providers finds, in accordance with each agency’s disciplinary and hearing process, that a health care provider who is licensed or certified by the agency has violated subsection (2) of this section, the agency shall revoke the health care provider’s licensure or certification.” Section 4, Part 4 Senate Bill 150 (R.S. 2023).

The Secretary leaves the issue of a hearing on the matter to the discretion of the Court.

Respectfully submitted,

/s/ Wesley W. Duke

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Certificate of Service

I certify I filed the above document via the CM/ECF system on June 5, 2023, which electronically served copies to all counsel of record.

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