

**IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO**

PLANNED PARENTHOOD
SOUTHWEST OHIO REGION, *et al.*,

Plaintiffs,

v.

OHIO DEPARTMENT OF HEALTH, *et al.*,

Defendants.

Case No. A 2100870

Judge Alison Hatheway

**PLAINTIFFS' MOTION FOR
JUDGMENT ON THE
PLEADINGS**

Pursuant to Civ.R. 12(c), Plaintiffs Planned Parenthood Southwest Ohio Region (“PPSWO”), Dr. Sharon Liner, Planned Parenthood of Greater Ohio (“PPGOH”), Preterm-Cleveland (“Preterm”), Women’s Med Group Professional Corporation (“WMGPC”), and Northeast Ohio Women’s Center (“NEOWC”) (collectively “Plaintiffs”) respectfully move this Court to enter judgment on the pleadings in their favor, to declare that 2020 Am.S.B. No. 27 (“S.B. 27”) violates the Ohio Constitution, and to enter a permanent injunction restraining Defendants, their employees, agents, and successors in office from enforcing S.B. 27.

A Memorandum in Support of this request is attached to this motion and incorporated herein by reference. A Proposed Order is submitted separately.

Dated: August 12, 2024

B. Jessie Hill #0074770
Freda J. Levenson #0045916
Rebecca Kendis #0099129
American Civil Liberties Union of Ohio
Foundation, Inc.
4506 Chester Ave.
Cleveland, OH 44103
(216) 368-0553 (Hill)
(614) 586-1972 x125 (Levenson)
(614) 586-1974 (fax)
bjh11@cwru.edu
flevenson@acluohio.org
rebecca.kendis@case.edu
*Counsel for Plaintiffs Preterm-Cleveland,
Women's Med Group Professional Corporation,
Northeast Ohio Women's Center LLC*

Jennifer Dalven* PHV #23858
Chelsea Tejada* PHV#25608
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2633
(212) 549-2650 (fax)
jdalven@aclu.org
ctejada@aclu.org
*Counsel for Plaintiffs Preterm-Cleveland,
Women's Med Group Professional Corporation
Northeast Ohio Women's Center LLC*

Rachel Reeves* PHV #23855
American Civil Liberties Union Foundation
915 15th St NW
Washington, DC 20005
(212) 549-2633
(212) 549-2650 (fax)
rreeves@aclu.org
*Counsel for Plaintiffs Preterm-Cleveland,
Women's Med Group Professional Corporation
Northeast Ohio Women's Center LLC*

*Application for *pro hac vice* granted

Respectfully submitted,

/s/ Camila Vega
* PHV #25650
Planned Parenthood Federation of America
123 William Street, Floor 9
New York, NY 10038
(908) 370-7449
(212) 245-1845 (fax)
camila.vega@ppfa.org
*Counsel for Plaintiffs Planned Parenthood
Southwest Ohio Region, Planned
Parenthood of Greater Ohio, and Sharon
Liner, M.D.*

Hannah Swanson* PHV #25808
Planned Parenthood Federation of America
1110 Vermont Ave. NW, Suite 300
Washington, DC 20005
(202) 494-8764
(202) 296-3242 (fax)
hannah.swanson@ppfa.org
*Counsel for Plaintiffs Planned Parenthood
Southwest Ohio Region, Planned
Parenthood of Greater Ohio, and Sharon
Liner, M.D.*

Fanon A. Rucker #0066880
The Cochran Firm
527 Linton Street
Cincinnati, OH 45219
(513) 381-4878
(513) 672-0814 (fax)
frucker@cochranohio.com
*Counsel for Plaintiffs Planned Parenthood
Southwest Ohio Region, Planned
Parenthood of Greater Ohio, and Sharon
Liner, M.D.*

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2024, the foregoing was electronically filed via the Court's e-filing system and served on counsel for all Defendants via email.

/s/ Camila Vega
Camila Vega