

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

WOMEN’S MEDICAL GROUP
PROFESSIONAL CORP., *et al.*,

Plaintiffs,

v.

VANDERHOFF, *et al.*,

Defendants.

Case No. A 2200704

Judge Alison Hatheway

PLAINTIFFS’ UNOPPOSED MOTION TO STAY PROCEEDINGS

Plaintiffs move for a stay of proceedings while the Court of Appeals in the First Appellate District of Ohio considers the Defendants’ appeal of this Court’s order compelling Defendant Bruce Vanderhoff, Director of the Ohio Department of Health, to appear for a deposition. *See* Provisional Entry Finding Jurisdiction, *Women’s Med. Group Professional Corp. v. Vanderhoff*, No. C-2500549 (1st Dist. Nov. 4, 2025). This Court recently reset the discovery deadline to January 16, 2026; the dispositive motions deadline to February 13, 2026; the Pretrial Conference to April 16, 2026; and the bench trial to begin on April 27, 2026. Entry Granting Pls.’ Mot. for Extension, Sept. 18, 2025. However, briefing will not be complete on the State Defendants’ appeal of this Court’s order compelling Director Vanderhoff to appear for a deposition until at least January 2, 2026, and the parties will then have to wait for the Court of Appeals to make its determination.

Good cause exists to stay the proceedings and these deadlines because the parties cannot complete discovery until after the Court of Appeals decides Defendants’ appeal of this Court’s order compelling Director Vanderhoff to appear for a deposition. The parties will similarly be

unable to proceed with dispositive motions, the pretrial conference, or trial until discovery is complete.

Plaintiffs therefore respectfully ask this Court to stay the proceedings until after the Court of Appeals decides Defendants' appeal of this Court's order compelling Director Vanderhoff to appear for a deposition. State Defendants have indicated that they do not oppose this motion. If the proceedings are stayed, Plaintiffs propose to submit a proposed revised discovery and dispositive motion schedule to this Court within two weeks after the Court of Appeals' ruling is issued.

Dated: November 20, 2025

Respectfully submitted,

/s/ B. Jessie Hill

B. Jessie Hill (0074770)
Freda J. Levenson (0045916)
Amy Gilbert (0100887)
Rebecca Kendis (0099129)
Maggie Scotece (0096030)
American Civil Liberties Union of Ohio
Foundation, Inc.
4506 Chester Ave.
Cleveland, OH 44103
Telephone: (216) 541-1376
Telephone: (216) 368-0553 (Hill)
Fax: (216) 472-2210
bjhl1@cwru.edu
flevenson@acluohio.org
agilbert@acluohio.org
rebecca.kendis@case.edu
mdl149@case.edu
*Counsel for Plaintiff Women's Med Group
Professional Corporation*

Kyla Eastling (Pro Hac Vice 27177)
Melissa Shube (Pro Hac Vice 27469)

Fanon A. Rucker (0066880)
The Cochran Firm
527 Linton Street
Cincinnati, OH 45219
Telephone: (513) 381-4878
Fax: (513) 672-0814
frucker@cochranohio.com
*Counsel for Plaintiff Planned Parenthood
Southwest Ohio Region*

Rachel Reeves (Pro Hac Vice 23855)
American Civil Liberties Union Foundation
915 15th St NW
Washington, DC 20005
Telephone: (212) 549-2633
Fax: (212) 549-2650
rreeves@aclu.org
*Counsel for Plaintiff Women's Med Group
Professional Corporation*

Brigitte Amiri (Pro Hac Vice 25768)
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor

Planned Parenthood Federation of America 123
William Street, 9th Floor
New York, NY 10038
Telephone: (212) 261-4649
Fax: (212) 247-6811
kyla.eastling@ppfa.org
melissa.shube@ppfa.org
*Counsel for Plaintiff Planned Parenthood
Southwest Ohio Region*

New York, NY 10004
Telephone: (212) 549-2633
Fax: (212) 549-2650
bamiri@aclu.org
*Counsel for Plaintiff Women's Med Group
Professional Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2025, the foregoing was electronically filed via the Court's e-filing system and will be served on counsel for all Defendants.

/s/ B. Jessie Hill

B. Jessie Hill (0074770)