

EXHIBIT 2

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** REQUEST FOR ADMISSION PRO HAC VICE FORTHCOMING*

ATTORNEYS FOR PLAINTIFFS

**IN THE DISTRICT COURT OF GUAM
TERRITORY OF GUAM**

GUAM SOCIETY OF OBSTETRICIANS
AND GYNECOLOGISTS, *et al.*,

Plaintiffs

vs.

LOURDES A. LEON GUERRERO, *et al.*,

Defendants.

CIVIL CASE NO. 90-00013

**DECLARATION OF
WILLIAM S. FREEMAN, M.D.**

WILLIAM S. FREEMAN, M.D., declares:

1. I am a plaintiff in the above-captioned case. I make this Declaration in support of the Motion for Dr. Bliss Kaneshiro, Dr. Shandhini Raidoo, and Famalao'an Rights to Intervene as Plaintiffs in this case. I have personal knowledge of the facts contained herein and if called as a witness I could and would testify competently thereto.

2. I am an obstetrician/gynecologist and am one of the original named plaintiffs in this case. I was an abortion provider in Guam at the time this case was filed in 1990 and provided abortion care for over thirty (30) years in Guam. In 2016, I became the island's sole abortion provider following the retirement of the only other physician who performed abortions, Dr. Edmund Griley. Dr. Griley and Dr. John Dunlop, both named plaintiffs in this case, are deceased.

3. In 2018, I stopped providing abortion care in Guam, became semi-retired and left Guam. I relocated permanently to the Philippines. I still maintain an active medical license in Guam and I travel to Guam to provide clinical care to several of my patients, particularly those with high-risk pregnancies, approximately 2-3 times a year. I no longer provide abortion care in Guam, or anywhere else. However, in the course of providing care to my pregnant patients in Guam, I sometimes counsel them about abortion care as an option, without any specific intent that they actually obtain an abortion. And, because I no longer provide abortions myself, if a patient is interested in abortion, I may refer them elsewhere for abortion care if needed.

4. If abortion were to be banned in Guam, I would want to continue to advise my pregnant patients in Guam about their pregnancy options, including abortion, and—if a patient is interested in abortion—to refer them off-island for legal abortion care. However, I am concerned that I may be prosecuted for violation of P.L. 20-134's prohibition on solicitation of abortion if I do so.

5. I am informed that two Hawaii OB/GYNs, Dr. Shandhini Raidoo and Dr. Bliss Kaneshiro, provide abortion care to patients in Guam. It is my understanding that they are the only two physicians who provide abortions to patients in Guam. It is my understanding that Dr. Raidoo and Dr. Kaneshiro seek to intervene in this case. I fully support their intervention in the case to ensure that the interests and experiences of present-day physicians who provide abortions to Guam residents are fully represented.

6. I am also informed that Famalao'an Rights, a non-profit organization that advocates for the right to abortion and the right to reproductive health care access, seeks to intervene in this case. I fully support their intervention in the case to ensure that their interests

and experiences as advocates for the right to abortion, and people who may seek abortions in the future, are fully represented.

I declare under penalty of perjury under the laws of Guam and the laws of the United States that the foregoing is true and correct.

W. Freeman MD 3/2/23

WILLIAM S. FREEMAN