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19 ARIZONA SUPERIOR COURT

20 MARICOPA COUNTY

21 Eric M. Reuss, M.D., M.P.H., on behalf of
22 himself, his staff, and his patients; Paul A.
23 Isaacson, M.D., on behalf of himself, his staff,
24 and his patients; and Planned Parenthood
Arizona, Inc., on behalf of itself, its
physicians, staff, and patients,

Plaintiffs,

v.

STATE OF ARIZONA, a body politic,

Defendant.

No. _____

**STIPULATION OF
NON-ENFORCEMENT**

1 Plaintiffs Dr. Eric M. Reuss, M.D., M.P.H.; Dr. Paul A. Isaacson, M.D.; and Planned
2 Parenthood Arizona, Inc., have filed a complaint against Defendant, State of Arizona (“the
3 State”), seeking a declaratory judgment and permanent injunction declaring that A.R.S. §§ 36-
4 2321–2326 (“the Ban”) violates article II, section 8.1 of the Arizona Constitution (“the
5 Amendment”) and is therefore unconstitutional and unenforceable. Plaintiffs and the State agree
6 and stipulate as follows:

- 7 1. The Ban is unconstitutional under article II, section 8.1 of the Arizona
8 Constitution.
- 9 2. The State, its agents, officers, and successors will not enforce the Ban in any
10 manner against any person during the pendency of this litigation.
- 11 3. The State, its agents, officers, and successors will not prosecute or otherwise
12 penalize or take any action against any person for conduct that allegedly violates
13 the Ban based on any conduct occurring during the pendency of this litigation.
- 14 4. In the event of a decision in this case that would allow the Ban to remain in effect,
15 the State, its agents, officers, and successors will not enforce the Ban in any
16 manner for a period of 30 days after all appeals are concluded or after the deadline
17 to file any and all further appeals in the above-captioned case has passed,
18 whichever occurs later.

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1 Dated: December 3, 2024
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PERKINS COIE LLP

3 By: /s/ Karin Scherner Aldama
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**Pro hac vice forthcoming*

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