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SUPREME COURT OF TEXAS
BLAKE A. HAWTHORNE, CLERK

No. _____

In the Supreme Court of Texas

In re STATE OF TEXAS; ATTORNEY GENERAL OF TEXAS; KEN PAXTON, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF TEXAS; TEXAS MEDICAL BOARD; AND STEPHEN BRINT CARLTON, IN HIS OFFICIAL CAPACITY AS EXECUTIVE DIRECTOR OF THE TEXAS MEDICAL BOARD,

Relators.

On Petition for Writ of Mandamus
from the 200th Judicial District Court, Travis County

PETITION FOR WRIT OF MANDAMUS

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The Honorable Maya Guerra Gamble, 200th Judicial District Court, Travis County

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"App." refers to the appendix to this petition. "MR." refers to the mandamus record.

Statement of the Case

Nature of the underlying proceeding:	Plaintiffs filed suit seeking declaratory and injunctive relief that Texas's abortion statutes cannot be enforced. MR.52–53.
Relators:	State of Texas Attorney General of Texas Ken Paxton Texas Medical Board Stephen Brint Carlton
Respondent:	The Honorable Maya Guerra Gamble, 200th Judicial District Court, Travis County
Real Parties in Interest:	Kate Cox Justin Cox Damla Karsan, M.D.
Respondent's challenged actions:	Respondent issued a temporary restraining order enjoining Relators from enforcing Texas's post-*Roe* abortion laws "against Plaintiffs and their staff, nurses, pharmacists, agents, and patients, as applied to Ms. Cox's current pregnancy." MR.206.

Statement of Jurisdiction

The Court has jurisdiction under Texas Government Code section 22.002(a) and article V, section 3(a) of the Texas Constitution. Relators have "compelling reason" for seeking a writ of mandamus from this Court without first going to the Third Court of Appeals. Tex. R. App. P. 52.3(e). Plaintiffs have indicated their intent to perform and procure an abortion while the TRO is in place. MR.51; MR.206–207. Because Plaintiffs evidently believe (incorrectly) that the TRO immunizes them from civil or criminal enforcement actions, see MR.51, each hour it remains in place is an hour that Plaintiffs believe themselves free to perform and procure an elective abortion. Nothing can restore the unborn child's life that will be lost as a result. Post hoc enforcement is no substitute, so time is of the essence. Relators therefore have compelling reason for seeking a writ of mandamus from this Court.

Issue Presented

Whether the district court abused its discretion in issuing the temporary restraining order prohibiting the enforcement of Texas abortion statutes.

To the Honorable Supreme Court of Texas:

The trial court entered a temporary restraining order allowing Plaintiffs to perform and procure an abortion of a single child even though Plaintiffs failed to plead and prove that they satisfy the requirements for a medical-emergency exception. By applying language not found in Texas law, the trial court's order represents an expansion of the statutory exceptions to Texas's abortion prohibitions. Because the life of an unborn child is at stake, this Court should require a faithful application of Texas statutes prior to determining that an abortion is permitted.

This Court should issue an emergency stay and mandamus relief. Should the abortion occur while the TRO is in place, nothing will prevent enforcement of Texas's civil and criminal penalties once the TRO erroneously prohibiting enforcement is vacated. But enforcement of Texas's laws will not restore the unborn child's life lost in the interim. That irreparable loss necessitates this Court's immediate action. Relators therefore respectfully request that this Court issue mandamus relief.

Statement of Facts

I. Background

Plaintiffs challenge Texas's Human Life Protection Act, Tex. Health & Safety Code ch. 170A; pre-*Roe* statutes, Tex. Rev. Civ. Stat. arts. 4512.1-.6; Senate Bill 8, Tex. Health & Safety Code §§ 171.201-.212; and the Texas Medical Board's authority to discipline physicians for violating a statute relating to the practice of medicine, Tex. Occ. Code §§ 165.001, 164.052(a)(5), 164.053(a), 164.055. The most relevant statute, the HLPA, prohibits most abortions but creates an exception when

> in the exercise of reasonable medical judgment, the pregnant female on whom the abortion is performed, induced, or attempted has a life-threatening physical condition aggravated by, caused by, or arising from a pregnancy that places the female at risk of death or poses a serious risk of substantial impairment of a major bodily function unless the abortion is performed or induced.

Tex. Health & Safety Code § 170A.002(b); *see also id.* § 171.002(3); Tex. Rev. Civ. Stat. 4512.6. Neither the HLPA, Senate Bill 8, nor the pre-*Roe* laws contain an exception to their general prohibition on abortion for unborn children with fatal conditions who are unlikely to survive long after birth.

II. Procedural History

A. In order to obtain a desired abortion, Plaintiffs Kate and Justin Cox filed suit on behalf of themselves and Plaintiff Dr. Karsan filed suit on behalf of herself and her staff, nurses, pharmacists, agents, and patients. MR.4, 8, 11. They sought declaratory and injunctive relief against the Attorney General, the Texas Medical Board, the Executive Director of the Texas Medical Board, and the State of Texas. MR.52–53. According to the petition, Ms. Cox learned that her child was diagnosed with the life limiting condition of Trisomy 18. MR.3. As a result of that diagnosis, Ms. Cox wants to abort her unborn child. MR.8 (Pet. at para 21). The petition does not identify what life-threatening physical condition Ms. Cox has been diagnosed with or how, absent an abortion, that condition creates a risk to her life or serious risk of substantial impairment of a major bodily function. *See* Tex. Health & Safety Code §170A.002(b). Instead, Plaintiffs have alleged only that the plaintiff physician, Dr. Karsan, "*believes in good faith*" that "abortion is medically recommended." MR.37 (emphasis added).

B. Plaintiffs sought a temporary restraining order allowing Plaintiffs to procure, conduct, and assist in procuring an abortion and enjoining Relators from bringing an action to enforce Texas's abortion laws. MR.51–52. Defendants opposed the TRO, pointing out that the allegations did not suffice under the statute and that the court did not have jurisdiction. MR.70–72. The Court granted the TRO. MR.203–207.

Summary of the Argument

The district court's granting of the TRO expands Texas's narrow statutory exceptions to its abortion prohibitions such that the exceptions swallow the rule. Further, the district court's order renders meaningless the statutory requirement that "*reasonable medical judgment*" counsel the necessity of an abortion to save the mother's life or avoid "a serious risk of substantial impairment of a major bodily function." Tex. Health & Safety Code § 170A.002(b). Contrary to the strict requirements of the statute, the Court granted the TRO on the feeble basis that the plaintiff-physician "believe[d] in good faith" that an abortion is "recommended." MR.37. The district court's circumvention of the basic requirements of the statute opens the floodgates to pregnant mothers procuring an abortion through a doctor who need only "believe[] in good faith" that an abortion is "recommended," and not necessary to avert a risk of death or impairment of a major bodily function. MR.37. Nor does the district court's order preserve the status quo: by entering an order allowing the abortion to go forward, the court in effect conferred final adjudication through a TRO. Lastly, the district court erred in failing to determine whether it had jurisdiction over Plaintiffs' lawsuit before ordering relief.

Relators and the people of Texas will be irreparably harmed by the TRO. Although Plaintiffs and their agents can later be prosecuted for violations of law committed under cover of a TRO, post hoc enforcement cannot restore the life of an unborn child lost in the interim. The Court should immediately stay the TRO and grant the petition for mandamus.

Standard of Review

Mandamus relief is available where the lower court's error "constitute[s] a clear abuse of discretion" and the relator lacks "an adequate remedy by appeal." *Walker v. Packer*, 827 S.W.2d 833, 839 (Tex. 1992) (orig. proceeding). There is no remedy on appeal from a temporary restraining order. *See In re Office of Attorney Gen.*, 257 S.W.3d 695, 698 (Tex. 2008) (orig. proceeding) (per curiam).

Argument

I. The Trial Court Abused Its Discretion by Granting Final Relief Through a Temporary Restraining Order.

The purpose of a TRO is to "preserve the status quo pending a ruling on the motion for a temporary injunction." *Fernandez v. Pimental*, 360 S.W.3d 643, 646 (Tex. App.—El Paso 2012, no pet.). Temporary injunctive relief is intended to be just that—temporary—and "may not be used to obtain an advance ruling on the merits." *Iranian Muslim Org. v. City of San Antonio*, 615 S.W.2d 202, 208 (Tex. 1981). The temporary restraining order at issue here authorizes Dr. Karsan to perform an abortion on Ms. Cox. That is not temporary relief, nor does it preserve the status quo. This Court has held that a trial court errs when it makes a "final" adjudication by granting a TRO. *In re Newton*, 146 S.W.3d 648, 652 (Tex. 2008) (orig.

proceeding). An abortion ends a life; it is an action that cannot be undone. No other relief could be more final.

II. The Trial Court Abused Its Discretion in Concluding that Ms. Cox's Condition Meets the Medical-Emergency Exception.

By Plaintiffs' own pleadings, they are not entitled to the relief they seek. Plaintiffs' allegations fall far short of demonstrating that Ms. Cox is entitled to any medical exception to Texas's statutory prohibitions on abortion.

A. *First*, Texas law does not permit abortions solely because the unborn child is unlikely to have sustained life outside the womb. There is no textual argument that fatal fetal conditions or fetal conditions incompatible with life are included within the medical-emergency exceptions, which focus only on the woman's life. *E.g.*, Tex. Health & Safety Code § 170A.002(b) (concerning life of the mother). The Legislature knows how to draft such exemptions. *See, e.g.*, *id.* §§ 171.0122(d)(3) (referring to unborn children who have an "irreversible medical condition or abnormality"), 171.046(c) (referring to unborn children who have a "severe fetal abnormality"). It did not do so here.

Second, Plaintiffs allege Ms. Cox had elevated glucose levels in October, similar to what she experienced in a prior pregnancy. MR.6. But there are no allegations that elevated glucose levels in October are a life-threatening physical condition, nor that they place her at risk of substantial impairment of a major bodily function. Indeed, Ms. Cox reported elevated glucose levels in a prior pregnancy for which she did *not* seek an abortion, presumably because that child did not have the same diagnoses. MR.6. Ms. Cox's decision to seek an abortion during this pregnancy based on

elevated glucose levels when she did not similarly seek one in the past strongly suggests no true medical emergency exists.

Third, Ms. Cox asserts she has experienced intermittent cramping, diarrhea, and mild fluid leaking. MR.6–7. According to Ms. Cox, each time she was examined for these complaints by emergency-room physicians, she was sent home. MR.7. There are no allegations that these symptoms were life-threatening physical conditions, that they are currently happening, or that they place Ms. Cox at risk of death or substantial impairment of a major bodily function.

And *fourth*, Ms. Cox claims an elevated risk of uterine rupture if she delivers the baby vaginally because she has had two prior C-sections. MR.7. She therefore believes a C-section is the safer option if the baby survives to term. MR.7. But while Ms. Cox alleges "that a C-section at full term would make subsequent pregnancies higher risk," MR.7, Plaintiffs plead no facts suggesting that a subsequent pregnancy would place Ms. Cox "at risk of death" or result in a "serious risk of substantial impairment of a major bodily function." *Compare* MR.7*, with* Tex. Health & Safety Code § 170A.002(b).

Consequently, none of these allegations demonstrate that Ms. Cox falls within the medical-emergency exception, contrary to the trial court's TRO.

B. Further, to fall within the medical exception, the physician performing the abortion must use "reasonable medical judgment" when determining that the necessary life-threatening physical condition exists. Tex. Health & Safety Code § 170A.002(b). Here, Plaintiffs have alleged only that the physician, Dr. Karsan, "*believes in good faith*" that "abortion is medically recommended." MR.37 (emphasis

added). This "good faith belief" is a subjective standard not sufficient under the law. By Plaintiffs' own pleadings, their allegations are insufficient to place them within the scope of any exception to Texas's abortion laws. Having pled themselves outside the terms of the statute, Plaintiffs have not demonstrated a probable right to the relief they seek, necessary for the issuance of a TRO.

III. The Trial Court Abused Its Discretion in Granting a Temporary Restraining Order Before Determining Jurisdiction.

A court that lacks subject-matter jurisdiction cannot enter injunctive relief "even temporarily." *In re Abbott*, 601 S.W.3d 802, 805 (Tex. 2020) (orig. proceeding) (per curiam). The district court erred in entering a temporary restraining order before determining whether it had jurisdiction. Although Defendants filed a Plea to the Jurisdiction, MR.69–201, the district court refused to consider it before issuing its ruling. But significant issues of standing and sovereign immunity should have limited the relief the trial court ordered.

A. Standing is a "constitutional prerequisite to suit." *Heckman v. Williamson County*, 369 S.W.3d 137, 150 (Tex. 2012), and the burden is on the plaintiff to "demonstrate standing for each claim," *Andrade v. NAACP of Austin*, 345 S.W.3d 1, 14 (Tex. 2011). Plaintiffs failed to establish standing for many of their claims. For example, Plaintiffs lack standing to challenge the constitutionality of S.B.8 by suing the Attorney General and the Executive Director because they lack statutory authority to enforce it. *See Whole Woman's Health v. Jackson*, 142 S. Ct. 522, 539 (2021); *Whole Woman's Health v. Jackson*, 642 S.W.3d 569 (Tex. 2022). And Plaintiffs lack standing to challenge the constitutionality of S.B.8 against the State of Texas because

S.B.8 is not enforced by the State. It is "enforced exclusively through the private civil actions" of private citizens. Tex. Health & Safety Code § 171.207(a). And Plaintiffs have not sued anyone who could bring a criminal prosecution under the pre-*Roe* laws. *See State v. Stephens*, 663 S.W.3d 45, 47, 52 (Tex. Crim. App. 2021). At a minimum, the trial court erred in purporting to enjoin Defendants from enforcing S.B. 8 and the pre-*Roe* laws. Moreover, Plaintiff Dr. Karsan purports to bring suit on behalf of a variety of other people. MR.11. But under Texas law, injuries to others typically do not suffice. The plaintiff "must plead facts demonstrating that he, himself (rather than a third party or the public at large), suffered the injury." *Meyers v. JDC/Firethorne, Ltd.*, 548 S.W.3d 477, 485 (Tex. 2018); *accord Kowalski v. Tesmer*, 543 U.S. 125, 129 (2004). The few instances in Texas law in which someone is permitted to sue for another's injuries are supported by statute or rule. None of those situations exist here. Dr. Karsan cannot assert the rights of her patients or her coworkers and cannot obtain relief on behalf of third parties.

B. Plaintiffs fail to establish a waiver of sovereign immunity. *See, e.g.*, *Town of Shady Shores v. Swanson*, 590 S.W.3d 544, 550 (Tex. 2019).

1. Plaintiffs obtained their TRO not on the basis of the constitutional invalidity of Texas law, but on statutory-interpretation grounds. MR.204–206. But "there is no general right to sue a state agency for a declaration of rights." *Tex. Parks & Wildlife Dep't v. Sawyer Tr.*, 354 S.W.3d 384, 388 (Tex. 2011). The UDJA supplies only an implied waiver for *validity* challenges to ordinances or statutes. *Tex. Dep't of Transp. v. Sefzik*, 355 S.W.3d 618, 621–22 (Tex. 2011); *see* Tex. Civ. Prac. & Rem. Code § 37.006(b). And even then, the claim cannot be facially invalid. *Abbott v. Mex.*

Am. Legis. Caucus, Tex. House of Representatives, 647 S.W.3d 681, 698 (Tex. 2022). The TRO does not purport to find any Texas law invalid, so it is unclear on what jurisdictional grounds the court acted.

2. Plaintiffs' ultra vires claims fare no better. The ultra vires exception applies to claims that a government official acted without lawful authority or failed to perform a purely ministerial act. *Hous. Belt & Terminal Ry. Co. v. City of Houston*, 487 S.W.3d 154, 161 (Tex. 2016). But "merely asserting legal conclusions or labeling a defendant's actions as 'ultra vires,' 'illegal,' or 'unconstitutional' does not suffice to plead an ultra vires claim—what matters is whether the facts alleged constitute actions beyond the governmental actor's statutory authority, properly construed." *Tex. Dep't of Transp. v. Sunset Transp., Inc.*, 357 S.W.3d 691, 702 (Tex. App.—Austin 2011, no pet.); *see also Klumb v. Houston Mun. Employees Pension Sys.*, 458 S.W.3d 1, 13 (Tex. 2015). As shown above, were Defendants to enforce the abortion prohibitions, it would not be ultra vires because Plaintiffs have not demonstrated that they fall within the medical-emergency exceptions. Jurisdiction, again, is lacking.

IV. Relators Have No Adequate Appellate Remedy.

Relators are entitled to mandamus relief because they lack an adequate remedy from the district court's order: they cannot appeal the grant of a temporary restraining order. *In re Office of Attorney General,* 257 S.W.3d 695. Future criminal and civil proceedings cannot restore the life that is lost if Plaintiffs or their agents proceed to perform and procure an abortion in violation of Texas law. Relators therefore request mandamus relief.

Prayer

The Court should grant this petition and issue a writ of mandamus directing the trial court to vacate its temporary restraining order of December 7, 2023.

Dated December 7, 2023

Respectfully submitted.

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Brent Webster
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Mandamus Certification

Pursuant to Texas Rule of Appellate Procedure 52.3(j), I certify that I have reviewed this petition and that every factual statement in the petition is supported by competent evidence included in the appendix or record. Pursuant to Rule 52.3(k)(1)(A), I certify that every document contained in the appendix is a true and correct copy.

/s/ Amy S. Hilton
Amy S. Hilton

Certificate of Service

On December 7, 2023, this document was served on Molly Duane, lead counsel for Real Parties in Interest via mduane@reproright.org and Austin Kaplan via AKaplan@kaplanlawatx.com.

/s/ Amy S. Hilton
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tex-82369697
SUPREME COURT OF TEXAS
BLAKE A. HAWTHORNE, CLERK

No. _____

In the Supreme Court of Texas

In re STATE OF TEXAS; ATTORNEY GENERAL OF TEXAS; KEN PAXTON, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF TEXAS; TEXAS MEDICAL BOARD; AND STEPHEN BRINT CARLTON, IN HIS OFFICIAL CAPACITY AS EXECUTIVE DIRECTOR OF THE TEXAS MEDICAL BOARD,
Relators.

On Petition for Writ of Mandamus
to the 200th Judicial District Court, Travis County

RELATORS' APPENDIX

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Tab A: Temporary Restraining Order (December 7, 2023)

12/07/2023 10:21:04 AM
Velva L. Price
District Clerk
Travis County
D-1-GN-23-008611

CAUSE NO. D-1-GN-23-008611

KATE COX; JUSTIN COX; and DAMLA KARSAN, M.D., on behalf of herself, her staff, nurses, pharmacists, agents, and patients,	IN THE DISTRICT COURT OF
Plaintiffs,	TRAVIS COUNTY, TEXAS
v.	200 JUDICIAL DISTRICT
STATE OF TEXAS; ATTORNEY GENERAL OF TEXAS, KEN PAXTON, in his official capacity as Attorney General of Texas; TEXAS MEDICAL BOARD; and STEPHEN BRINT CARLTON, in his official capacity as Executive Director of the Texas Medical Board,	
Defendants.	

[redacted] TEMPORARY RESTRAINING ORDER

On the 7 day of December, 2023, the Court considered Plaintiffs Kate Cox, Justin Cox, and Dr. Damla Karsan's Application for Temporary Restraining Order ("Application") seeking to restrain Defendants State of Texas, Attorney General of Texas, Ken Paxton, Texas Medical Board, and Stephen Brint Carlton ("Defendants"), their agents, servants, employees, attorneys, and all persons in active concert and participation with Defendants from enforcing Texas's abortion bans and laws, codified at Tex. Health & Safety Code §§ 170A.001-002 (the "Trigger Ban"), Tex. Health & Safety Code §§ 171.002(3), 171.203-205 ("S.B. 8"), and 1925 Tex. Penal Code arts. 1191-96 (the "pre-*Roe* Ban"), and certain Texas abortion laws utilizing the same medical exception, Tex. Health & Safety Code §§ 170A.001-002, 171.002(3), 171.203-205, 171.152, 171.0124, 285.202, against Plaintiffs Kate and Justin Cox and Plaintiff Dr. Karsan and her staff, nurses, pharmacists, agents, and patients. After consideration of the Application and pursuant to the Texas Rule of Civil Procedure 680, the Court hereby finds:

FINDINGS

The Court finds that Ms. Cox's life, health, and fertility are currently at serious risk, and she needs a dilation and evacuation ("D&E") abortion immediately to preserve her life, health, and fertility. Ms. Cox's circumstances meet the medical exception to Texas's abortion bans and laws.

Ms. Cox is currently 20 weeks pregnant. Ms. Cox has two young children already, both delivered by cesarean surgery ("C-section"). Her third child has been diagnosed with full trisomy 18. After multiple screenings, ultrasounds, and diagnostic testing, Ms. Cox's physicians have confirmed that her baby may not survive to birth and, if so, will only live for minutes, hours, or days.

The longer Ms. Cox stays pregnant, the greater the risks to her life. Ms. Cox has already been to three emergency rooms with severe cramping, diarrhea, and leaking unidentifiable fluid. If she is forced to continue this pregnancy, Ms. Cox is at a particularly high risk for gestational hypertension, gestational diabetes, fetal macrosomia, post-operative infections, anesthesia complications, uterine rupture, and hysterectomy, due to her two prior C-sections and underlying health conditions. If she is forced to carry this pregnancy to term, she will likely need a third C-section. Undergoing a third C-section would make subsequent pregnancies higher risk and make it less likely that Ms. Cox would be able to carry another child in the future.

Dr. Karsan has met Ms. Cox, reviewed her medical records, and believes in good faith, exercising her best medical judgment, that a D&E abortion is medically recommended for Ms. Cox and that the medical exception to Texas's abortion bans and laws permits an abortion in Ms. Cox's circumstances. Dr. Karsan, however, cannot risk liability under Texas's abortion bans and laws for providing Ms. Cox's abortion absent intervention from the Court confirming that doing so will not jeopardize Dr. Karsan's medical license, finances, and personal liberty.

Mr. Cox is married to Ms. Cox and is the father of her children. He is ready to assist Ms. Cox in obtaining an abortion in Texas but needs assurances from this Court that doing so will not violate Texas's abortion bans and laws.

The Court finds that (1) Dr. Karsan is a Texas-licensed physician, and (2), consistent with Dr. Karsan's good faith belief and medical recommendation, that Ms. Cox has a life-threatening physical condition aggravated by, caused by, or arising from her current pregnancy that places her at risk of death or poses a serious risk of substantial impairment of her reproductive functions if a D&E abortion is not performed. Ms. Cox's circumstances thus fall within the medical exception to Texas's abortion bans and laws. Texas law therefore permits Dr. Karsan to perform, induce, or attempt an abortion for Ms. Cox, and permits Mr. Cox to assist Ms. Cox in obtaining that abortion.

This Court further finds that a D&E abortion is the method of abortion medically necessary to preserve Ms. Cox's life, health, and future fertility, and poses far fewer risks than an induction or a C-section.

The Court further finds that the risks to Ms. Cox's life, health, and fertility do not arise from a claim or diagnosis that Ms. Cox would engage in conduct that might result in her own death or self-harm.

Money damages are insufficient to remedy the injuries to Plaintiffs that will result if Defendants are not enjoined from instituting civil, criminal, or disciplinary investigations or actions under Texas's abortion bans and laws related to the abortion Ms. Cox is currently seeking. Conversely, Defendants will not be harmed if the Court restrains them and anyone in active participation or concert with them from enforcing Texas's abortion bans and laws as applied to the abortion Ms. Cox is currently seeking.

Defendants are responsible for enforcing Texas's abortion bans and laws. Defendant State of Texas enforces all Texas laws and includes persons acting under color of state law who could potentially enforce S.B. 8 and the pre-*Roe* ban. Defendants Attorney General Paxton, the Texas Medical Board, and Stephen Brint Carlton are statutorily empowered to assess civil penalties and disciplinary sanctions against anyone who violates the Trigger Ban and other Texas abortion laws. Defendants have not disavowed enforcement of these laws in circumstances like Ms. Cox's, nor have they provided any clarity as to how physicians like Dr. Karsan or persons like Mr. Cox should interpret the medical exception to Texas's abortion bans and laws that Defendants enforce. Violations of Texas's abortion bans and laws are subject to heavy penalties, including lifetime imprisonment, hundreds of thousands of dollars in fines and penalties, and loss of professional license. The Court finds that Plaintiffs are reasonably chilled from performing or aiding in the performance of an abortion for Ms. Cox without issuance of temporary relief restraining Defendants.

Defendants were provided notice of the cause of action, the Application, and the hearing conducted. Unless Defendants are restrained, Plaintiffs face an imminent threat of irreparable harm under Texas's abortion bans and laws. Judicial intervention is necessary to preserve Plaintiffs' legal right to obtain, provide, aid, or abet the abortion Ms. Cox is currently seeking.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

A. A Temporary Restraining Order is entered enjoining Defendants, their officers, agents, servants, employees, and attorneys, and those persons in active participation or concert with them, from enforcing Texas's abortion bans and laws, codified at Tex. Health & Safety Code §§ 170A.001-002, 171.002(3), 171.203-205, 171.152, 171.0124, 285.202 against Plaintiffs and their staff, nurses, pharmacists, agents, and patients, as applied to Ms. Cox's current pregnancy.

B. Defendants shall provide notice of this Temporary Restraining Order to their officers, agents, servants, employees, and attorneys, and all other persons in active participation or concert with them.

C. The matter is scheduled for a permanent injunction hearing on the 20 day of December, 2024, at 9:00am

D. Plaintiffs' bond is set at $10.00. A law firm check or credit card is sufficient to post bond. Upon the filing of the bond required herein, the Clerk of this Court shall issue a Temporary Restraining Order in conformity with the law and the terms of this Order Granting Plaintiffs' Application for Temporary Restraining Order.

E. All parties may be served with notice of this Temporary Restraining Order and of the hearing on the request for Permanent Injunction in any matter provided under Rule 21a of the Texas Rules of Civil Procedure.

F. This Temporary Restraining Order shall expire on 12-21, 2023, at 5:00 p.m.

SIGNED this 7 day of December, 2023, at 10:09 a.m. ~~p.m.~~

PRESIDING JUDGE

MAYA GUERRA GAMBLE
459th DISTRICT COURT

TAB B: HUMAN LIFE PROTECTION ACT, TEX. HEALTH & SAFETY CODE §§ 170A.001-.007

Human Life Protection Act of 2021

HEALTH AND SAFETY CODE
TITLE 2. HEALTH
SUBTITLE H. PUBLIC HEALTH PROVISIONS
CHAPTER 170A. PERFORMANCE OF ABORTION

Sec. 170A.001. DEFINITIONS.
In this chapter:

(1) "Abortion" has the meaning assigned by Section 245.002.

(2) "Fertilization" means the point in time when a male human sperm penetrates the zona pellucida of a female human ovum.

(3) "Pregnant" means the female human reproductive condition of having a living unborn child within the female's body during the entire embryonic and fetal stages of the unborn child's development from fertilization until birth.

(4) "Reasonable medical judgment" means a medical judgment made by a reasonably prudent physician, knowledgeable about a case and the treatment possibilities for the medical conditions involved.

(5) "Unborn child" means an individual living member of the homo sapiens species from fertilization until birth, including the entire embryonic and fetal stages of development.

Sec. 170A.002. PROHIBITED ABORTION; EXCEPTIONS.

(a) A person may not knowingly perform, induce, or attempt an abortion.

(b) The prohibition under Subsection (a) does not apply if:

(1) the person performing, inducing, or attempting the abortion is a licensed physician;

(2) in the exercise of reasonable medical judgment, the pregnant female on whom the abortion is performed, induced, or attempted has a life-threatening physical condition aggravated by, caused by, or arising from a pregnancy that places the female at risk of death or poses a serious risk of substantial impairment of a major bodily function unless the abortion is performed or induced; and

(3) the person performs, induces, or attempts the abortion in a manner that, in the exercise of reasonable medical judgment, provides the best opportunity for the unborn child to survive unless, in the reasonable medical judgment, that manner would create:

(A) a greater risk of the pregnant female's death; or

(B) a serious risk of substantial impairment of a major bodily function of the pregnant female.

(c) A physician may not take an action authorized under Subsection (b) if, at the time the abortion was performed, induced, or attempted, the person knew the risk of death or a substantial impairment of a major bodily function described by Subsection (b)(2) arose from a claim or diagnosis that the female would engage in conduct that might result in the female's death or in substantial impairment of a major bodily function.

(d) Medical treatment provided to the pregnant female by a licensed physician that results in the accidental or unintentional injury or death of the unborn child does not constitute a violation of this section.

Sec. 170A.003. CONSTRUCTION OF CHAPTER.

This chapter may not be construed to authorize the imposition of criminal, civil, or administrative liability or penalties on a pregnant female on whom an abortion is performed, induced, or attempted.

Sec. 170A.004. CRIMINAL OFFENSE.

(a) A person who violates Section 170A.002 commits an offense.

(b) An offense under this section is a felony of the second degree, except that the offense is a felony of the first degree if an unborn child dies as a result of the offense.

Sec. 170A.005. CIVIL PENALTY.

A person who violates Section 170A.002 is subject to a civil penalty of not less than $100,000 for each violation. The attorney general shall file an action to recover a civil penalty assessed under this section and may recover attorney's fees and costs incurred in bringing the action.

Sec. 170A.006. CIVIL REMEDIES UNAFFECTED.

The fact that conduct is subject to a civil or criminal penalty under this chapter does not abolish or impair any remedy for the conduct that is available in a civil suit.

Sec. 170A.007. DISCIPLINARY ACTION.

In addition to any other penalty that may be imposed under this chapter, the appropriate licensing authority shall revoke the license, permit, registration,

certificate, or other authority of a physician or other health care professional who performs, induces, or attempts an abortion in violation of Section 170A.002.

TAB C: TEXAS HEARTBEAT ACT, TEX. HEALTH & SAFETY CODE §§ 171.201-.212

Texas Heartbeat Act

HEALTH AND SAFETY CODE
TITLE 2. HEALTH
SUBTITLE H. PUBLIC HEALTH PROVISIONS
CHAPTER 171. ABORTION
SUBCHAPTER H. DETECTION OF FETAL HEARTBEAT

Sec. 171.201. DEFINITIONS.
In this subchapter:

(1) "Fetal heartbeat" means cardiac activity or the steady and repetitive rhythmic contraction of the fetal heart within the gestational sac.

(2) "Gestational age" means the amount of time that has elapsed from the first day of a woman's last menstrual period.

(3) "Gestational sac" means the structure comprising the extraembryonic membranes that envelop the unborn child and that is typically visible by ultrasound after the fourth week of pregnancy.

(4) "Physician" means an individual licensed to practice medicine in this state, including a medical doctor and a doctor of osteopathic medicine.

(5) "Pregnancy" means the human female reproductive condition that:

(A) begins with fertilization;

(B) occurs when the woman is carrying the developing human offspring; and

(C) is calculated from the first day of the woman's last menstrual period.

(6) "Standard medical practice" means the degree of skill, care, and diligence that an obstetrician of ordinary judgment, learning, and skill would employ in like circumstances.

(7) "Unborn child" means a human fetus or embryo in any stage of gestation from fertilization until birth.

Sec. 171.202. LEGISLATIVE FINDINGS.
The legislature finds, according to contemporary medical research, that:

(1) fetal heartbeat has become a key medical predictor that an unborn child will reach live birth;

(2) cardiac activity begins at a biologically identifiable moment in time, normally when the fetal heart is formed in the gestational sac;

(3) Texas has compelling interests from the outset of a woman's pregnancy in protecting the health of the woman and the life of the unborn child; and

(4) to make an informed choice about whether to continue her pregnancy, the pregnant woman has a compelling interest in knowing the likelihood of her unborn child surviving to full-term birth based on the presence of cardiac activity.

Sec. 171.203. DETERMINATION OF PRESENCE OF FETAL HEARTBEAT REQUIRED; RECORD.

(a) For the purposes of determining the presence of a fetal heartbeat under this section, "standard medical practice" includes employing the appropriate means of detecting the heartbeat based on the estimated gestational age of the unborn child and the condition of the woman and her pregnancy.

(b) Except as provided by Section 171.205, a physician may not knowingly perform or induce an abortion on a pregnant woman unless the physician has determined, in accordance with this section, whether the woman's unborn child has a detectable fetal heartbeat.

(c) In making a determination under Subsection (b), the physician must use a test that is:

(1) consistent with the physician's good faith and reasonable understanding of standard medical practice; and

(2) appropriate for the estimated gestational age of the unborn child and the condition of the pregnant woman and her pregnancy.

(d) A physician making a determination under Subsection (b) shall record in the pregnant woman's medical record:

(1) the estimated gestational age of the unborn child;

(2) the method used to estimate the gestational age; and

(3) the test used for detecting a fetal heartbeat, including the date, time, and results of the test.

Sec. 171.204. PROHIBITED ABORTION OF UNBORN CHILD WITH DETECTABLE FETAL HEARTBEAT; EFFECT.

(a) Except as provided by Section 171.205, a physician may not knowingly perform or induce an abortion on a pregnant woman if the physician detected a fetal heartbeat for the unborn child as required by Section 171.203 or failed to perform a test to detect a fetal heartbeat.

(b) A physician does not violate this section if the physician performed a test for a fetal heartbeat as required by Section 171.203 and did not detect a fetal heartbeat.

(c) This section does not affect:

(1) the provisions of this chapter that restrict or regulate an abortion by a particular method or during a particular stage of pregnancy; or

(2) any other provision of state law that regulates or prohibits abortion.

Sec. 171.205. EXCEPTION FOR MEDICAL EMERGENCY; RECORDS.

(a) Sections 171.203 and 171.204 do not apply if a physician believes a medical emergency exists that prevents compliance with this subchapter.

(b) A physician who performs or induces an abortion under circumstances described by Subsection (a) shall make written notations in the pregnant woman's medical record of:

(1) the physician's belief that a medical emergency necessitated the abortion; and

(2) the medical condition of the pregnant woman that prevented compliance with this subchapter.

(c) A physician performing or inducing an abortion under this section shall maintain in the physician's practice records a copy of the notations made under Subsection (b).

Sec. 171.206. CONSTRUCTION OF SUBCHAPTER.

(a) This subchapter does not create or recognize a right to abortion before a fetal heartbeat is detected.

(b) This subchapter may not be construed to:

(1) authorize the initiation of a cause of action against or the prosecution of a woman on whom an abortion is performed or induced or attempted to be performed or induced in violation of this subchapter;

(2) wholly or partly repeal, either expressly or by implication, any other statute that regulates or prohibits abortion, including Chapter 6-1/2, Title 71, Revised Statutes; or

(3) restrict a political subdivision from regulating or prohibiting abortion in a manner that is at least as stringent as the laws of this state.

Sec. 171.207. LIMITATIONS ON PUBLIC ENFORCEMENT.

(a) Notwithstanding Section 171.005 or any other law, the requirements of this subchapter shall be enforced exclusively through the private civil actions described in Section 171.208. No enforcement of this subchapter, and no enforcement of Chapters 19 and 22, Penal Code, in response to violations of this subchapter, may be taken or threatened by this state, a political subdivision, a district or county attorney, or an executive or administrative officer or employee of this state or a political subdivision against any person, except as provided in Section 171.208.

(b) Subsection (a) may not be construed to:

(1) legalize the conduct prohibited by this subchapter or by Chapter 6-1/2, Title 71, Revised Statutes;

(2) limit in any way or affect the availability of a remedy established by Section 171.208; or

(3) limit the enforceability of any other laws that regulate or prohibit abortion.

Sec. 171.208. CIVIL LIABILITY FOR VIOLATION OR AIDING OR ABETTING VIOLATION.

(a) Any person, other than an officer or employee of a state or local governmental entity in this state, may bring a civil action against any person who:

(1) performs or induces an abortion in violation of this subchapter;

(2) knowingly engages in conduct that aids or abets the performance or inducement of an abortion, including paying for or reimbursing the costs of an abortion through insurance or otherwise, if the abortion is performed or induced in violation of this subchapter, regardless of whether the person knew or should have known that the abortion would be performed or induced in violation of this subchapter; or

(3) intends to engage in the conduct described by Subdivision (1) or (2).

(b) If a claimant prevails in an action brought under this section, the court shall award:

(1) injunctive relief sufficient to prevent the defendant from violating this subchapter or engaging in acts that aid or abet violations of this subchapter;

(2) statutory damages in an amount of not less than $10,000 for each abortion that the defendant performed or induced in violation of this subchapter, and for each abortion performed or induced in violation of this subchapter that the defendant aided or abetted; and

(3) costs and attorney's fees.

(c) Notwithstanding Subsection (b), a court may not award relief under this section in response to a violation of Subsection (a)(1) or (2) if the defendant demonstrates that the defendant previously paid the full amount of statutory damages under Subsection (b)(2) in a previous action for that particular abortion performed or induced in violation of this subchapter, or for the particular conduct that aided or abetted an abortion performed or induced in violation of this subchapter.

(d) Notwithstanding Chapter 16, Civil Practice and Remedies Code, or any other law, a person may bring an action under this section not later than the fourth anniversary of the date the cause of action accrues.

(e) Notwithstanding any other law, the following are not a defense to an action brought under this section:

(1) ignorance or mistake of law;

(2) a defendant's belief that the requirements of this subchapter are unconstitutional or were unconstitutional;

(3) a defendant's reliance on any court decision that has been overruled on appeal or by a subsequent court, even if that court decision had not been overruled when the defendant engaged in conduct that violates this subchapter;

(4) a defendant's reliance on any state or federal court decision that is not binding on the court in which the action has been brought;

(5) non-mutual issue preclusion or non-mutual claim preclusion;

(6) the consent of the unborn child's mother to the abortion; or

(7) any claim that the enforcement of this subchapter or the imposition of civil liability against the defendant will violate the constitutional rights of third parties, except as provided by Section 171.209.

(f) It is an affirmative defense if:

(1) a person sued under Subsection (a)(2) reasonably believed, after conducting a reasonable investigation, that the physician performing or inducing the abortion had complied or would comply with this subchapter; or

(2) a person sued under Subsection (a)(3) reasonably believed, after conducting a reasonable investigation, that the physician performing or inducing the abortion will comply with this subchapter.

(f-1) The defendant has the burden of proving an affirmative defense under Subsection (f)(1) or (2) by a preponderance of the evidence.

(g) This section may not be construed to impose liability on any speech or conduct protected by the First Amendment of the United States Constitution, as made

applicable to the states through the United States Supreme Court's interpretation of the Fourteenth Amendment of the United States Constitution, or by Section 8, Article I, Texas Constitution.

(h) Notwithstanding any other law, this state, a state official, or a district or county attorney may not intervene in an action brought under this section. This subsection does not prohibit a person described by this subsection from filing an amicus curiae brief in the action.

(i) Notwithstanding any other law, a court may not award costs or attorney's fees under the Texas Rules of Civil Procedure or any other rule adopted by the supreme court under Section 22.004, Government Code, to a defendant in an action brought under this section.

(j) Notwithstanding any other law, a civil action under this section may not be brought by a person who impregnated the abortion patient through an act of rape, sexual assault, incest, or any other act prohibited by Sections 22.011, 22.021, or 25.02, Penal Code.

Sec. 171.209. CIVIL LIABILITY: UNDUE BURDEN DEFENSE LIMITATIONS.

(a) A defendant against whom an action is brought under Section 171.208 does not have standing to assert the rights of women seeking an abortion as a defense to liability under that section unless:

(1) the United States Supreme Court holds that the courts of this state must confer standing on that defendant to assert the third-party rights of women seeking an abortion in state court as a matter of federal constitutional law; or

(2) the defendant has standing to assert the rights of women seeking an abortion under the tests for third-party standing established by the United States Supreme Court.

(b) A defendant in an action brought under Section 171.208 may assert an affirmative defense to liability under this section if:

(1) the defendant has standing to assert the third-party rights of a woman or group of women seeking an abortion in accordance with Subsection (a); and

(2) the defendant demonstrates that the relief sought by the claimant will impose an undue burden on that woman or that group of women seeking an abortion.

(c) A court may not find an undue burden under Subsection (b) unless the defendant introduces evidence proving that:

(1) an award of relief will prevent a woman or a group of women from obtaining an abortion; or

(2) an award of relief will place a substantial obstacle in the path of a woman or a group of women who are seeking an abortion.

(d) A defendant may not establish an undue burden under this section by:

(1) merely demonstrating that an award of relief will prevent women from obtaining support or assistance, financial or otherwise, from others in their effort to obtain an abortion; or

(2) arguing or attempting to demonstrate that an award of relief against other defendants or other potential defendants will impose an undue burden on women seeking an abortion.

(e) The affirmative defense under Subsection (b) is not available if the United States Supreme Court overrules *Roe v. Wade*, 410 U.S. 113 (1973) or *Planned Parenthood v. Casey*, 505 U.S. 833 (1992), regardless of whether the conduct on which the cause of action is based under Section 171.208 occurred before the Supreme Court overruled either of those decisions.

(f) Nothing in this section shall in any way limit or preclude a defendant from asserting the defendant's personal constitutional rights as a defense to liability under Section 171.208, and a court may not award relief under Section 171.208 if the conduct for which the defendant has been sued was an exercise of state or federal constitutional rights that personally belong to the defendant.

Sec. 171.210. CIVIL LIABILITY: VENUE.

(a) Notwithstanding any other law, including Section 15.002, Civil Practice and Remedies Code, a civil action brought under Section 171.208 shall be brought in:

(1) the county in which all or a substantial part of the events or omissions giving rise to the claim occurred;

(2) the county of residence for any one of the natural person defendants at the time the cause of action accrued;

(3) the county of the principal office in this state of any one of the defendants that is not a natural person; or

(4) the county of residence for the claimant if the claimant is a natural person residing in this state.

(b) If a civil action is brought under Section 171.208 in any one of the venues described by Subsection (a), the action may not be transferred to a different venue without the written consent of all parties.

Sec. 171.211. SOVEREIGN, GOVERNMENTAL, AND OFFICIAL IMMUNITY PRESERVED.

(a) This section prevails over any conflicting law, including:

(1) the Uniform Declaratory Judgments Act; and

(2) Chapter 37, Civil Practice and Remedies Code.

(b) This state has sovereign immunity, a political subdivision has governmental immunity, and each officer and employee of this state or a political subdivision has official immunity in any action, claim, or counterclaim or any type of legal or equitable action that challenges the validity of any provision or application of this chapter, on constitutional grounds or otherwise.

(c) A provision of state law may not be construed to waive or abrogate an immunity described by Subsection (b) unless it expressly waives immunity under this section.

Sec. 171.212. SEVERABILITY.

(a) Mindful of *Leavitt v. Jane L.*, 518 U.S. 137 (1996), in which in the context of determining the severability of a state statute regulating abortion the United States Supreme Court held that an explicit statement of legislative intent is controlling, it is the intent of the legislature that every provision, section, subsection, sentence, clause, phrase, or word in this chapter, and every application of the provisions in this chapter, are severable from each other.

(b) If any application of any provision in this chapter to any person, group of persons, or circumstances is found by a court to be invalid or unconstitutional, the remaining applications of that provision to all other persons and circumstances shall be severed and may not be affected. All constitutionally valid applications of this chapter shall be severed from any applications that a court finds to be invalid, leaving the valid applications in force, because it is the legislature's intent and priority that the valid applications be allowed to stand alone. Even if a reviewing court finds a provision of this chapter to impose an undue burden in a large or substantial fraction of relevant cases, the applications that do not present an undue burden shall be severed from the remaining applications and shall remain in force, and shall be treated as if the legislature had enacted a statute limited to the persons, group of persons, or circumstances for which the statute's application does not present an undue burden.

(b-1) If any court declares or finds a provision of this chapter facially unconstitutional, when discrete applications of that provision can be enforced against

a person, group of persons, or circumstances without violating the United States Constitution and Texas Constitution, those applications shall be severed from all remaining applications of the provision, and the provision shall be interpreted as if the legislature had enacted a provision limited to the persons, group of persons, or circumstances for which the provision's application will not violate the United States Constitution and Texas Constitution.

(c) The legislature further declares that it would have enacted this chapter, and each provision, section, subsection, sentence, clause, phrase, or word, and all constitutional applications of this chapter, irrespective of the fact that any provision, section, subsection, sentence, clause, phrase, or word, or applications of this chapter, were to be declared unconstitutional or to represent an undue burden.

(d) If any provision of this chapter is found by any court to be unconstitutionally vague, then the applications of that provision that do not present constitutional vagueness problems shall be severed and remain in force.

(e) No court may decline to enforce the severability requirements of Subsections (a), (b), (b-1), (c), and (d) on the ground that severance would rewrite the statute or involve the court in legislative or lawmaking activity. A court that declines to enforce or enjoins a state official from enforcing a statutory provision does not rewrite a statute, as the statute continues to contain the same words as before the court's decision. A judicial injunction or declaration of unconstitutionality:

(1) is nothing more than an edict prohibiting enforcement that may subsequently be vacated by a later court if that court has a different understanding of the requirements of the Texas Constitution or United States Constitution;

(2) is not a formal amendment of the language in a statute; and

(3) no more rewrites a statute than a decision by the executive not to enforce a duly enacted statute in a limited and defined set of circumstances.

TAB D: PRE-*ROE* LAWS, TEX. REV. CIV. STAT. ARTS. 4512.1-.6

Pre-*Roe* Laws

VERNON'S CIVIL STATUTES
TITLE 71. HEALTH—PUBLIC
CHAPTER 6-1/2. ABORTION

Art. 4512.1. ABORTION.
If any person shall designedly administer to a pregnant woman or knowingly procure to be administered with her consent any drug or medicine, or shall use towards her any violence or means whatever externally or internally applied, and thereby procure an abortion, he shall be confined in the penitentiary not less than two nor more than five years; if it be done without her consent, the punishment shall be doubled. By "abortion" is meant that the life of the fetus or embryo shall be destroyed in the woman's womb or that a premature birth thereof be caused.

Art. 4512.2. FURNISHING THE MEANS.
Whoever furnishes the means for procuring an abortion knowing the purpose intended is guilty as an accomplice.

Art. 4512.3. ATTEMPT AT ABORTION.
If the means used shall fail to produce an abortion, the offender is nevertheless guilty of an attempt to produce abortion, provided it be shown that such means were calculated to produce that result, and shall be fined not less than one hundred nor more than one thousand dollars.

Art. 4512.4. MURDER IN PRODUCING ABORTION.
If the death of the mother is occasioned by an abortion so produced or by an attempt to effect the same it is murder.

Art. 4512.5. DESTROYING UNBORN CHILD.
Whoever shall during parturition of the mother destroy the vitality or life in a child in a state of being born and before actual birth, which child would otherwise have been born alive, shall be confined in the penitentiary for life or for not less than five years.

Art. 4512.6. BY MEDICAL ADVICE.

Nothing in this chapter applies to an abortion procured or attempted by medical advice for the purpose of saving the life of the mother.

Automated Certificate of eService

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Filing Description: 20231207_Cox Mandamus final
Status as of 12/8/2023 12:24 AM CST

Associated Case Party: Kate Cox

Name	BarNumber	Email	TimestampSubmitted	Status
Austin Kaplan	24072176	akaplan@kaplanlawatx.com	12/7/2023 11:45:32 PM	SENT
Molly Duane		mduane@reprorights.org	12/7/2023 11:45:32 PM	SENT

Associated Case Party: Justin Cox

Name	BarNumber	Email	TimestampSubmitted	Status
Austin Kaplan	24072176	akaplan@kaplanlawatx.com	12/7/2023 11:45:32 PM	SENT
Molly Duane		mduane@reprorights.org	12/7/2023 11:45:32 PM	SENT

Associated Case Party: Damla Karsan

Name	BarNumber	Email	TimestampSubmitted	Status
Austin Kaplan	24072176	akaplan@kaplanlawatx.com	12/7/2023 11:45:32 PM	SENT
Molly Duane		mduane@reprorights.org	12/7/2023 11:45:32 PM	SENT

Associated Case Party: Maya Guerra Gamble

Name	BarNumber	Email	TimestampSubmitted	Status
Maya Guerra Gamble		shannon.matusek-steele@traviscountytx.gov	12/7/2023 11:45:32 PM	SENT

Associated Case Party: State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Amy Hilton	24097834	Amy.Hilton@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Johnathan Stone	24071779	Johnathan.Stone@oag.texas.gov	12/7/2023 11:45:32 PM	SENT

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below:

Tamera Martinez on behalf of Amy Hilton
Bar No. 24097834
tamera.martinez@oag.texas.gov
Envelope ID: 82369697
Filing Code Description: Petition
Filing Description: 20231207_Cox Mandamus final
Status as of 12/8/2023 12:24 AM CST

Associated Case Party: State of Texas

Johnathan Stone	24071779	Johnathan.Stone@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Amy Pletscher	24113663	amy.pletscher@oag.texas.gov	12/7/2023 11:45:32 PM	SENT

Associated Case Party: Ken Paxton

Name	BarNumber	Email	TimestampSubmitted	Status
Amy Hilton	24097834	Amy.Hilton@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Johnathan Stone	24071779	Johnathan.Stone@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Amy Pletscher	24113663	amy.pletscher@oag.texas.gov	12/7/2023 11:45:32 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Tamera Martinez		tamera.martinez@oag.texas.gov	12/7/2023 11:45:32 PM	SENT

Associated Case Party: StephenBrintCarlton

Name	BarNumber	Email	TimestampSubmitted	Status
Johnathan Stone	24071779	Johnathan.Stone@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Amy Pletscher	24113663	amy.pletscher@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Amy Hilton	24097834	Amy.Hilton@oag.texas.gov	12/7/2023 11:45:32 PM	SENT

Associated Case Party: Texas Medical Board

Name	BarNumber	Email	TimestampSubmitted	Status
Amy Pletscher	24113663	amy.pletscher@oag.texas.gov	12/7/2023 11:45:32 PM	SENT

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Associated Case Party: Texas Medical Board

Amy Pletscher	24113663	amy.pletscher@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Johnathan Stone	24071779	Johnathan.Stone@oag.texas.gov	12/7/2023 11:45:32 PM	SENT
Amy Hilton	24097834	Amy.Hilton@oag.texas.gov	12/7/2023 11:45:32 PM	SENT