

Raph Graybill
Graybill Law Firm, PC
300 4th Street North
PO Box 3586
Great Falls, MT 59403
(406) 452-8566
rgraybill@silverstatelaw.net

Kimberly Parker*
Nicole Rabner*
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Avenue NW
Washington, DC 20006
(202) 663-6000
kimberly.parker@wilmerhale.com
nicole.rabner@wilmerhale.com

Alan Schoenfeld*
Michelle Nicole Diamond*
Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
alan.schoenfeld@wilmerhale.com
michelle.diamond@wilmerhale.com

CLERK OF THE
DISTRICT COURT
TERRY WALPIN

2021 SEP 17 A 11:19

FILED

Hana Bajramovic*
Planned Parenthood Federation of America,
Inc. DEPUTY
123 William St., 9th Floor
New York, NY 10038
(212) 541-7800
hana.bajramovic@ppfa.org

Alice Clapman*
Planned Parenthood Federation of America,
Inc.
1110 Vermont Ave., N.W., Ste. 300
Washington, D.C. 20005
(202) 973-4862
alice.clapman@ppfa.org

Gene R. Jarussi
1631 Zimmerman Tr., Suite 1
Billings, MT 59102
(406) 861-2317
gene@lawmontana.com

Attorneys for Plaintiffs

*Motions for pro hac vice forthcoming

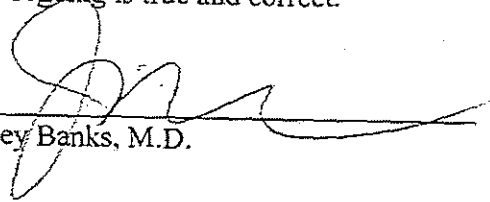
**MONTANA THIRTEENTH JUDICIAL DISTRICT COURT,
YELLOWSTONE COUNTY**

PLANNED PARENTHOOD OF MONTANA,)	
and JOEY BANKS, M.D., on behalf of)	Cause No. DV-21-999
themselves and their patients,)	
)	Hon. Gregory R. Todd
Plaintiffs,)	
)	
vs.)	
)	REPLY AFFIDAVIT OF
STATE OF MONTANA, by and through AUSTIN)	JOEY BANKS
KNUDSEN, in his official capacity as Attorney)	
General,)	
)	
Defendant.)	

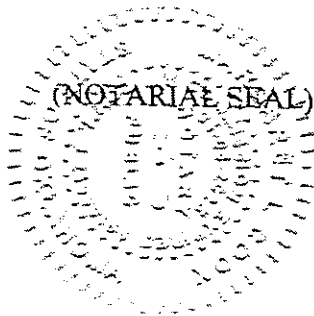
4. Drs. Skop and Mulcaire-Jones suggest that providing medication abortion via telehealth is inappropriate for rural patients because they would be “abandoned” if they experience complications. Skop Decl. ¶ 57; Mulcaire-Jones Decl. ¶ 88. PPMT does not “abandon” patients, whether we provide their care via telehealth or in-person. All abortion patients are given a phone number, staffed 24/7 by a medical professional, and are told to call that number with any concerns. In the limited circumstances in which complications arise, PPMT generally treats patients in-clinic and refers the few patients who experience emergency situations to the closest emergency department (as the safest course). Because medication abortion complications are similar to those of a miscarriage, which emergency departments see frequently, emergency physicians are well-equipped to handle them.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 9/16/21


Joey Banks, M.D.

Subscribed and sworn to before me this 16th day of September, 2021.



Margaret L. Cook

Printed Name: Margaret L. Cook

MARGARET L COOK
Notary Public, State of Oklahoma
Commission # 21000156
My Commission Expires 01-05-2025