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**Admitted pro hac vice*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

Planned Parenthood Arizona, Inc.; *et al.*

Plaintiffs,

v.

Mark Brnovich, Arizona Attorney General, *et al.*

Defendants.

Case No. 2:15-CV-01022-PHX-SPL
STIPULATION TO DISMISS

The parties, by and through undersigned counsel of record, state as follows:

1. On June 4, 2015, Plaintiffs commenced a lawsuit seeking declaratory and injunctive relief from enforcement of S.B. 1318, 52nd Leg., 1st Reg. Sess. (AZ 2015) (“S.B. 1318”), by filing an action in this Court challenging the constitutionality of portions of the S.B. 1318. ECF No. 1.

1 2. On June 15, 2015, Defendants stipulated to a Temporary Restraining Order.
2 ECF No. 30. On June 16, 2015, Court entered an Order temporarily enjoining Defendants
3 from enforcing the challenged provisions and set dates for a hearing on Plaintiff's Motion
4 for a Preliminary Injunction. ECF No. 32.

5 3. The parties then began discovery, during which time the Court set the case for
6 trial. *See* ECF No. 95. The parties engaged in discovery, and later, trial preparation, until
7 the Court vacated the trial dates. *See* ECF No. 107.

8 4. On October 8, 2015, Defendants stipulated to a Preliminary Injunction. ECF
9 No. 94. On October 16, 2015, the Court entered an Order preliminarily enjoining
10 Defendants from enforcing the challenged provisions and vacating the trial dates. ECF
11 No. 107.

12 5. On May 17, 2016, Arizona Senate Bill 1112, 52nd Leg., 2nd Reg. Sess. (AZ
13 2016) ("S.B. 1112"), was enacted. S.B. 1112, *inter alia*, repeals the portions of S.B. 1318
14 that Plaintiffs have challenged in this case, significantly modifies the directive to the
15 Arizona Department of Health Services ("ADHS") (codified at Ariz. Rev. Stat. § 36-
16 2153(C)(8)), and no longer requires ADHS to post information about medication abortion
17 reversal on ADHS's website and in related materials. S.B. 1112 states that the
18 legislature's purpose in enacting this legislation includes resolving pending litigation.

19 6. On August 6, 2016, S.B. 1112 took effect. ADHS has also modified its
20 website and printed materials to remove information about medication abortion reversal.

21 7. The parties therefore stipulate that this matter be dismissed.

22 8. Plaintiffs intend to file a motion seeking reimbursement for attorneys' fees and
23 costs pursuant to 42 U.S.C. § 1988. The parties are hopeful they will be able to resolve
24 this matter without further litigation. Due to the number of parties involved and upcoming
25 vacations around Labor Day, the parties respectfully request additional time to attempt to
26 reach a resolution on this matter, specifically until September 23, 2016, or other date
27 selected by the Court. If the parties are not able to reach a resolution, Plaintiffs will file
28 their motion on or before September 23, 2016.

9. A proposed Order is submitted simultaneously herewith.

Respectfully submitted this 18th day of August, 2016.

By /s/ Lawrence Rosenfeld

By /s/ Doug Drury

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Attorney for Plaintiffs

Doug Drury
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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of August 2016, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF system for filing.

/s/ Lawrence Rosenfeld
Lawrence Rosenfeld
Attorney for Plaintiffs