

EXHIBIT #2

COUNTY OF RAMSEY

CIVIL DIVISION

Case Type: Civil Order / Miscellaneous

Dr. Jane Doe; Mary Moe; First Unitarian
Society of Minneapolis; and Our Justice,

Court File No.: 62-CV-19-3868

Judge: Hon. Thomas A. Gilligan, Jr.

Plaintiffs,

v.

Governor of Minnesota; Attorney General of
Minnesota; Minnesota Commissioner of
Health; Minnesota Board of Medical Practice;
and Minnesota Board of Nursing,

Defendants.

DECLARATION OF RILEY KEANE

Riley Keane hereby declares under penalty of perjury that the following statements are true and correct:

1. I work for the Northwest Abortion Access Fund (NWAAF). Our organization serves Washington, Oregon, Idaho, and Alaska. We help people pay for abortion care and travel related to abortion care. We ensure people traveling for care have a safe place to stay near their clinic.

2. My position at NWAAF is Travel Team Lead. In this position I conduct intake and facilitate access to reproductive healthcare. I am also called in to supervise staff and volunteers when cases are particularly difficult.

3. In 2021 NWAAF assisted three people from Minnesota fly to Seattle for abortion care.

4. It is my understanding that Minnesota has only one provider for abortion care after 15 week. That one provider was completely booked and unable to take any patients.

5. Two of those patients were Hmong women. They had both tried booking an appointment at the one provider mentioned above around October 2021, but were told there were no open appointments.

6. We arranged for care for both of those patients in Seattle.

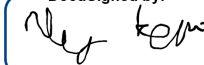
7. One of those patients tried to drive herself to Seattle because she lived in a large multigenerational household and did not want to risk picking up COVID in an airport and infecting her family. On the way to Seattle her car broke down. We had to work quickly to reschedule her appointment in Seattle and ensure she could make the trip.

8. Both of these women require a special diet related to Hmong culture, beliefs, and traditions regarding pregnancy. Minnesota has a large Hmong population, but Washington does not.

9. I was called in to help with these cases to ensure we were able to provide these women with culturally competent care before and after their abortions. Thankfully, I was eventually able to connect with a local Washington Hmong group who helped ensure these women's cultural needs were met while they were away from home and family.

10. It was extremely stressful for the patients to have to leave their community and fly across the country to receive their abortion care. It is my understanding that neither of them had family or community in Seattle, nor did they have the resources to travel out of state and pay for their abortions.

Dated: 1/12/2022

DocuSigned by:

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Riley Keane