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8 Counsel for Amici Curiae  
9 AMERICAN HOSPITAL ASSOCIATION et al.

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 State of California, et al.,

13 Plaintiffs,

14 v.

15 Donald J. Trump, et al.,

16 Defendants.

Case No. 17-cv-05895-VC

**DECLARATION OF ANDREW FURLOW  
IN SUPPORT OF MOTION OF THE  
AMERICAN HOSPITAL ASSOCIATION,  
THE FEDERATION OF AMERICAN  
HOSPITALS, THE CATHOLIC HEALTH  
ASSOCIATION OF THE UNITED  
STATES, AND THE ASSOCIATION OF  
AMERICAN MEDICAL COLLEGES FOR  
LEAVE TO FILE AS AMICUS CURIAE.**

1 Andrew Furlow declares:

2 1. That this declaration is made to the best of my knowledge and belief based on facts  
3 provided to me by the American Hospital Association, the Federation of American Hospitals, the  
4 Catholic Health Association of The United States, and the Association of American Medical  
5 Colleges (“Amici”).  
6

7 2. The American Hospital Association represents more than 5,000 hospitals, health care  
8 systems, and other health care organizations, plus 43,000 individual members. AHA members  
9 are committed to improving the health of communities they serve and to helping ensure that care  
10 is available to and affordable for all Americans. AHA educates its members on health care issues  
11 and advocates to ensure that their perspectives are considered in formulating health policy.  
12

13 3. The Federation of American Hospitals is the national representative of more than 1,000  
14 investor-owned or managed community hospitals and health systems throughout the United  
15 States. Dedicated to a market-based philosophy, the Federation provides representation and  
16 advocacy on behalf of its members to Congress, the Executive Branch, the judiciary, media,  
17 academia, accrediting organizations, and the public.  
18

19 4. The Catholic Health Association of the United States is the national leadership  
20 organization for the Catholic health ministry. Comprised of more than 600 hospitals and 1,400  
21 long-term care and other health facilities in all 50 states, the Catholic health ministry is the largest  
22 group of nonprofit health care providers in the nation. CHA works to advance the ministry’s  
23 commitment to a just, compassionate health care system that protects life.

24 5. The Association of American Medical Colleges is a not-for-profit association  
25 representing all 147 accredited U.S. and 17 accredited Canadian medical schools; nearly 400  
26 major teaching hospitals and health systems, including 51 Department of Veterans Affairs  
27 medical centers; and more than 80 academic and scientific societies. Through these institutions  
28

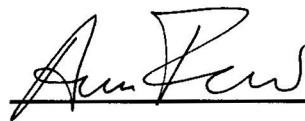
1 and organizations, the AAMC serves the leaders of America's medical schools and teaching  
2 hospitals and their nearly 160,000 faculty members, 83,000 medical students, and 115,000  
3 resident physicians.

4  
5 6. The cost-sharing reduction (CSR) subsidies at issue in this case are a central  
6 component of the Affordable Care Act. Elimination of the CSR subsidies risks adding to the  
7 ranks of uninsured Americans, as well as potential destabilization of health insurance  
8 marketplaces. The case therefore has important potential consequences for all Americans, and for  
9 Amici in particular as the representatives of over 6,000 hospitals and health care related systems  
10 and institutions across the United States.

11  
12 7. Amici bring a unique perspective to the case. Amici's members are deeply affected by  
13 the nation's health care laws, including the Affordable Care Act. Amici's members are at the  
14 front line of implementing the Act's requirements. This affords Amici extensive experience with  
15 the public health and financial consequences of the Act itself as well as a special understanding of  
16 the consequences of removing one of the law's critical components.

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

18 Executed in Arlington, Virginia on October 21, 2017.

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22 Andrew S. Furlow  
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