

# EXHIBIT 14

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

PLANNED PARENTHOOD CENTER FOR  
CHOICE, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as  
Governor of Texas, *et al.*,

Defendants.

No. 1:20-cv-00323-LY

**DECLARATION OF CLORA JOHNSON IN FURTHER SUPPORT OF PLAINTIFFS’  
MOTION FOR A PRELIMINARY INJUNCTION**

I, Clora Johnson, declare as follows:

1. I am the General Manager for Plaintiff Planned Parenthood South Texas Surgical Center, where I oversee the operations of three facilities that provide abortion care.
2. I submit this declaration in further support of Plaintiffs’ motion for a preliminary injunction, which seeks to enjoin Executive Order No. GA-09, as applies to previability abortion care, as well as the Texas Medical Board’s emergency amendment to 22 TAC § 187.57 (“Emergency Rule”), which imposes the same requirements.
3. The facts I state here are based on the conversations I have had directly with patients to cancel their abortion appointments after the Texas Attorney General issued his press release regarding the Executive Order, as well as conversations I had on March 31, 2020, after the Fifth Circuit Court of Appeals stayed the District Court’s temporary restraining order. If called and sworn as a witness, I could and would testify competently thereto.

4. As of the end of the day on March 31, 2020, PPST's health centers had cancelled 112 abortions as a result of the Executive Order.

5. I have worked for 19 years with patients who are facing some of the most difficult circumstances of their lives—and so I am accustomed to talking to people in crisis. However, the conversations I have had over the last few days, when telling people that their appointments are suddenly cancelled and that they can no longer obtain abortion services in Texas, have been some of the most difficult conversations of my life.

6. Almost every patient I have spoken with has cried and all have been devastated.

7. Many of these patients have lost their jobs because of the pandemic and they told me they do not know how they are supposed to continue a pregnancy while trying to support themselves and their families without a job. Some patients who have jobs are concerned that their pregnancies will cause them to lose their jobs, particularly where they are suffering pregnancy-related symptoms that make it difficult for them to continue working. They do not know how they are going to survive or how they are supposed to support themselves and their families, let alone support a pregnancy.

8. I know from conversations that at least some patients, after being denied care in Texas, travelled out of state, including by air travel, to obtain their abortion care. I know of at least four patients who traveled to Colorado to obtain care by plane. Two of these four patients said that they were afraid of flying during the COVID-19 pandemic, but that they had no other choice.

9. I know of at least three patients who traveled to New Mexico—roughly an eleven hour drive—though my understanding is that appointments there are scarce.

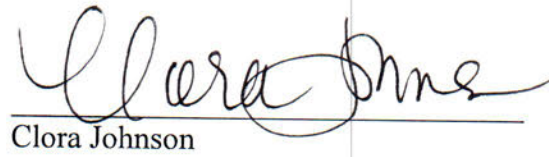
10. I know that at least three of the patients who traveled out of state were forced to do so because their pregnancies were so far along that they could not wait until the Executive Order's current expiration date in order to obtain care (even assuming the order does not get extended). These are only the patients who have told us that they are travelling out of state, I can only imagine how many others of our patients who have been turned away are currently trying to obtain out-of-state abortion care.

11. Every time I have to call one of these patients to cancel an appointment, I know it is causing them to experience a major change in their life, one that could seriously harm them, their health and their future. I do not know what to say to them—what do I even say to someone whose future I'm throwing into tumult? I can only apologize that they have to go through this.

12. In my role, I am familiar with how abortion care is scheduled in our health centers. Although we try very hard to schedule patients as quickly as we can, sometimes that is not possible, even in the absence of a pandemic. Even if the Executive Order is not extended beyond its current expiration date, I am worried that all the patients who have not been able to get abortion care will suddenly try to get appointments at the same time, and that this will create a multi-week backlog. If that happens, not all patients will be able to receive care, and many others will be delayed far longer than the Executive Order requires.

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

Executed April 1, 2020

  
Clara Johnson