

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

JUNE MEDICAL SERVICES, LLC d/b/a HOPE MEDICAL
GROUP FOR WOMEN, on behalf of its patients,
physicians, and staff,

Plaintiff,

v.

STEPHEN R. RUSSO, in his official capacity as Interim
Secretary of the Louisiana Department of Health;
JIMMY GUIDRY, M.D., in his official capacity as State
Health Officer; and JEFF LANDRY, in his official
capacity as Attorney General for the State of
Louisiana,

Defendants.

No. 3:20-cv-229-JWD-EWD

JOINT MOTION FOR EXTENSION OF TIME

The Parties, by and through their respective attorneys, jointly move to extend certain deadlines set by the Court on April 23, 2020, ECF No. 13.

1. Plaintiff filed a Complaint, ECF No. 1, on April 13.
2. On April 15, the Court scheduled a telephonic conference for April 17. ECF No. 9.
3. Following the April 17 conference, the Court issued a briefing schedule, ordered the Parties to meet and confer in good faith to narrow the issues before the Court, and scheduled a hearing on Plaintiff's Application for Temporary Restraining Order. ECF No. 11.
4. On April 20, at the Parties' request, the Court held an unscheduled status conference. Defendants represented to the Court that the Louisiana Department of Health ("LDH") planned to issue a notice superseding the directive challenged in this litigation, LDH Healthcare Facility Notice/Order #2020-COVID19-All-007. Accordingly, the Court suspended all deadlines, and ordered the Parties to meet and confer about the new notice to

determine if there are any remaining issues for this Court to address and to report back to the Court no later than 2 days from the date the order is issued, if not before. ECF No. 12.

5. LDH issued Healthcare Facility Notice/Order #2020-COVID19-All-010 on April 20, which goes into effect at 12:01 am CST on April 27, 2020. On April 22, the Parties conferred in good faith, and requested additional time to resolve or narrow outstanding issues. The Court granted this request, directing the parties to report to the Court the status of discussions on by 3:00 pm on Friday, April 24. ECF No. 13.
6. Per the Court's directive, the Parties met and conferred again on April 24, and have reached agreement in principle on several issues. The Parties require, however, additional time to confer in order to come to an agreement on certain terms and a draft of the proposed stipulation. The Parties accordingly seek until the end of Wednesday, April 29, to determine if this process will resolve the issues currently before this Court.
7. In consideration of the above, the Parties jointly move to extend the deadline to report to the Court the status of discussions until end of day on April 29.

Date: April 24, 2020

By: /s/ Ellie T. Schilling
Ellie T. Schilling
SCHONEKAS, EVANS, McGOEY
& McEACHIN, LLC
909 Poydras Street, Suite 1600
New Orleans, LA 70112
Phone/Cell: (504) 680-6050
E-mail: Ellie@semmlaw.com

Jenny Ma*
Caroline Sacerdote*
Arielle Humphries*
CENTER FOR REPRODUCTIVE RIGHTS
199 Water Street, 22nd Floor
New York, New York 10038
Phone/Cell: (917) 637-3705
Email: jma@reprorights.org
ATTORNEYS FOR PLAINTIFF

By: /s/ Elizabeth Murrill
Elizabeth Murrill
Solicitor General
OFFICE OF THE ATTORNEY GENERAL
1885 North Third Street
Baton Rouge, LA 70802
Phone: 225-326-6766
Email: MurrillE@ag.louisiana.gov

ATTORNEY FOR DEFENDANTS

* Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2020, a true and correct copy of the foregoing was served on counsel for Defendants via the Middle District of Louisiana's Electronic Filing System.

/s/ Ellie T. Schilling
Ellie T. Schilling

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[PROPOSED] ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME

Upon consideration of the Parties' Joint Motion to for Extension of time, IT IS HEREBY ORDERED that the Motion is granted. The deadline set by the Court on April 23, 2020, ECF No. 13, to report to the Court the status of discussions is extended to _____ P.M. CST on Wednesday, April 29, 2020.

IT IS SO ORDERED.

SIGNED this _____ day of _____, 2020.

HON. JOHN W. DEGRAVELLES
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA