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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

MONTANA MEDICAL
ASSOCIATION, et al.,

Plaintiffs,

and

MONTANA NURSES
ASSOCIATION,

Plaintiff-Intervenors,

v.

AUSTIN KNUDSEN, et al.,

Defendants.

CV 21-108-M-DWM

DECLARATION OF WALLACE L.
PAGE

I, Wallace (“Wally”) L. Page, declare, pursuant to 28 U.S.C. § 1746 and
under penalty of perjury, that the foregoing is true and correct:

1. I am a Plaintiff in the above-entitled action. The facts set forth in this Declaration are known to me based on my personal knowledge and belief.

2. I am 80 years old and I live in Kalispell, Montana with my wife Jo. I have been diagnosed with non-Hodgkins lymphoma and multiple myeloma, which has required ongoing chemotherapy treatment. These illnesses, and their treatments, have impacted my sleeping, concentrating, energy, mobility, all every day activities.

3. I currently receive chemotherapy treatment at Logan Health in Kalispell, Montana, which involves frequent (sometimes weekly) infusions, blood testing and injections for immune system support. I take an oral chemo medication once per day at home. My immune system is compromised due to my medical conditions and chemotherapy treatments.

4. As a result of my health conditions, I am more susceptible to communicable diseases and I am at a higher risk of harm from such diseases.

5. Due to my health conditions, I have been very cautious and I have tried to avoid exposure to diseases. My wife and I have isolated ourselves as much as we can, and generally avoided seeing people or attending large gatherings. We have recently started seeing friends and family in small groups, still masking, and have started attending some of our grandchildren's events.

6. Frequent trips to my health care providers are not optional—if I do not attend these visits, I face the risk of serious illness or death due to my health conditions. Despite the risk of getting sick, I cannot put off or avoid going to the hospital or my doctor's office for ongoing cancer treatments.

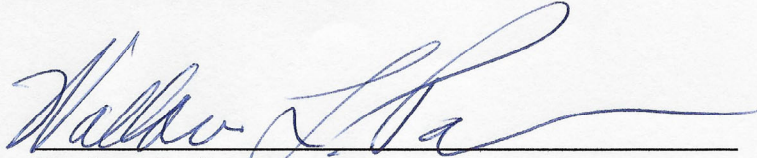
7. Both my wife and I contracted COVID recently. We are both vaccinated and thankfully we recovered. We have gone back to being more cautious again. We are more concerned now that we are headed into fall when flu and COVID are expected to be worse.

8. While most of my healthcare treatments cannot be postponed, over the last two years I have been unable to obtain dental treatment due to my compromised immune system and added risk of exposure during the pandemic.

9. I recently cut my finger, which ordinarily would require me to go to the emergency room to receive a stitch or two. I made the decision to forego treatment at an emergency room or urgent care because of the risk of exposure to disease. One of my biggest fears is going to an emergency room or urgent care waiting area, given the amount of sick people at these locations and the fact that not all people, including the healthcare workers, are vaccinated. Over the last two years, I have avoided seeking urgent or emergency care unless absolutely necessary. I have elected to self-treat this cut and do not plan to go to the emergency room for treatment.

10. I expect that my medical providers are vaccinated. Prior to House Bill 702 and the media coverage surrounding the new law, I assumed all of my medical providers were vaccinated.

DATED this 12 day of September, 2022.



Wallace L. Page