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December 26, 2019

Denise McNerney, Merits Clerk  
Supreme Court of the United States  
1 First Street, N.E.  
Washington, D.C. 20543

Re: *June Medical Services, LLC v. Gee*, Nos. 18-1323 & 18-1460

Dear Ms. McNerney:

Pursuant to Rule 32.3, I am writing to seek leave to lodge two supplemental appendices, both of which are the subject of Louisiana's Motion to Supplement the Record and to File Certain Documents Under Seal. These two supplemental appendices, plus another supplemental appendix that is also the subject of the Motion, require somewhat different treatment.

*First*, Louisiana seeks leave to lodge a document entitled Supplemental Appendix. The Supplemental Appendix need not be sealed, and it contains two declarations and one exhibit. The supplemental appendix will include non-confidential evidence of changes in the abortion landscape in Louisiana since the trial record closed. Such information is directly relevant to the merits of the case, and is cited in Louisiana's opening brief. Once lodged, this appendix can be filed once the Court grants Louisiana's motion.

*Second*, Louisiana seeks leave to lodge a document entitled Supplemental *Sealed* Appendix. This appendix will include publicly available—though confidential—information about the clinic affiliations of several abortion providers in Louisiana. This information is relevant to the merits of the case, and Louisiana would ordinarily be entitled to cite them directly in its briefs. However, that information includes the true names of the abortion providers. Throughout this case, these abortion providers have been addressed anonymously. Although Louisiana disagrees that anonymity is proper, it does not challenge the issue for purposes of its motion. The Supplemental Sealed Appendix should, as its name suggests, be sealed to preserve that anonymity. Once lodged, this appendix can likewise be filed once the Court grants Louisiana's motion.

*Third*, through its Motion, Louisiana seeks leave to file a third document entitled Second Supplemental Sealed Appendix. The information in that document is currently subject to a protective order in *June Medical Services, LLC v. Gee*, No. 3:16-cv-444 (M.D. La.). The documents included in this appendix are relevant to the questions presented in case no. 18-1460, as they demonstrate a conflict of interest between Plaintiffs and their patients. Because of the protective order, Louisiana is unable to even lodge this appendix with the Court unless and until the Court grants its motion.

The details of each appendix are addressed more fully in Louisiana's motion. Based on the foregoing, Louisiana seeks leave to lodge the Supplemental Appendix and the Supplemental Sealed Appendix at this time.

Thank you for your assistance.

Sincerely,



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Elizabeth B. Murrill

Counsel of Record for Dr. Rebekah Gee

cc: Travis J. Tu, Counsel for Petitioner/Cross-Respondent (*via email*)