

	on other obstetrician-gynecology practices, including his, or other facilities that perform office-based procedures.
Tracy Cowles, M.D. 12200 W 106th Street, Suite 110 Overland Park, KS 66215	Dr. Cowles will testify about the office-based procedures she provides, including those that are comparable to abortion and that she makes referrals to Drs. Hodes & Nauser for pregnancy terminations. Dr. Cowles will also testify that there is no medical reason to impose the regulations on Dr. Hodes & Nauser, which are not imposed on other obstetrician-gynecology practices, like hers, or other facilities that perform office-based procedures, and the impact such regulations would have on her practice.
Elizabeth Raymond, M.D., M.P.H. Gynuity Health Projects 15 East 26th Street New York, NY 10010	Dr. Raymond will testify about the safety of legal abortion—including both medication and surgical abortion—including the safety of legal abortion as compared to other pregnancy outcomes and as compared to other outpatient medical procedures. Dr. Raymond will also testify that diminished access to legal abortion is a threat to public health.
Joshua Freeman, M.D. The University of Kansas Physicians Medical Office Building 3901 Rainbow Blvd MS 4010 Kansas City, KS 66160	Dr. Freeman will testify about the status of abortion in Kansas, and the climate in which women access and providers perform abortions in the state.
Jane Doe[s]	Patients will testify regarding the effect and potential effect of the regulations on their ability to access abortions.
Any Witnesses Identified by Defendants	

Dated: March 7, 2016

Respectfully submitted,

By: /s/ Teresa A. Woody
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The undersigned hereby certifies that the above and foregoing was filed with the Clerk of the Court and served on the following by email, on March 7, 2016.

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	for Summary Judgment on Plaintiffs' Claims under the Kansas Equal Protection Clause
10.	Declaration of James Mirable, M.D., in Opposition to Defendants' Motion for Summary Judgment on Plaintiffs' Claims under the Kansas Equal Protection Clause
11.	Declaration of Elizabeth Gray Raymond, M.D., M.P.H., in Opposition to Defendants' Motion for Summary Judgment on Plaintiffs' Claims under the Kansas Equal Protection Clause
12.	Curriculum Vitae of Tracy Cowles, M.D.
13.	Curriculum Vitae of Elizabeth Gray Raymond, M.D., M.P.H.
14.	Curriculum Vitae of James Mirable, M.D.
15.	Curriculum Vitae of Traci Lynn Nauser, M.D.
16.	Curriculum Vitae of Joshua Freeman, M.D.
17.	All deposition transcripts in any deposition in this case
18.	All exhibits used in any deposition in this case
19.	Kansas Department of Health and Environment November 2, 2011 letter to Teresa Woody, Esq.
20.	All Exhibits Created by or Referred to by Any Witness
21.	All Demonstrative Exhibits
22.	All Exhibits Identified or Introduced by Defendants

Dated: March 7, 2016

Respectfully submitted,

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