

EXHIBIT B

**IN THE
CIRCUIT COURT OF ST. LOUIS, MISSOURI
22nd JUDICIAL CIRCUIT**

REPRODUCTIVE HEALTH SERVICES OF
PLANNED PARENTHOOD OF THE ST. LOUIS
REGION

Petitioner,

v.

MICHAEL L. PARSON, et al.

Respondents.

Case No. 1922-CC02395

**MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

COMES NOW Petitioner, by counsel, and moves this Court for a temporary restraining order and preliminary injunction to enjoin Respondents from continuing to abuse its regulatory authority by refusing to grant Petitioner's application for license renewal and from allowing Petitioner's license to expire. Without immediate intervention from this Court, the license of Missouri's last remaining generally available abortion provider will lapse on May 31, 2019, while its renewal application languishes in limbo while Respondents complete a pretextual investigation of indefinite scope. Should Respondents succeed, Missouri will become the first state in the nation without access to an abortion clinic and over 1.1 million Missouri women of reproductive age will face a world we have not seen since before 1973 when *Roe v. Wade*, 410 U.S. 113 (1973), was decided.

In support of this motion, Petitioner submits Suggestions in Support of Motion of Temporary Restraining Order and Preliminary Injunction.

Dated: May 28, 2019

Respectfully submitted,

STINSON LLP

By: /s/ Jamie L. Boyer

Jamie L. Boyer, MO No. 55209
7700 Forsyth Boulevard, Suite 1100
St. Louis, Missouri 63105
Phone: (314) 863-0800
Facsimile: (314) 863-9388
jamie.boyer@stinson.com

Charles W. Hatfield, MO No. 40363
Alixandra S. Cossette, MO No. 68114
230 W. McCarty Street
Jefferson City, Missouri 65101
Phone: (573) 636-6263
Facsimile: (573) 636-6231
chuck.hatfield@stinson.com
alixandra.cossette@stinson.com

PLANNED PARENTHOOD FEDERATION OF AMERICA

Jennifer Sandman*
Christine Clarke*
123 William St., 9th Floor
New York, NY 10038
Phone: (212) 541-780
Fax: (212) 247-6811
jennifer.sandman@ppfa.org
christine.clarke@ppfa.org

Richard Muniz*
1110 Vermont Ave., NW Ste. 300
Washington, D.C. 20005
Phone: (202) 973-4800
Fax: (202) 296-3480

*Attorneys for Reproductive Health Services of
Planned Parenthood of the St. Louis Region*

** Pro hac vice motion forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed via the Court's electronic filing system on May 28, 2019, and a copy was personally served upon:

Eric Schmitt
Missouri Attorney General
Supreme Court Building
207 W. High St.
Jefferson City, MO 65101

Randall W. Williams, M.D., Director
Missouri Department of Social Services
912 Wildwood
Jefferson City, MO 65109

Missouri Department of Social Services
c/o Randall W. Williams, M.D., Director
912 Wildwood
Jefferson City, MO 65109

Michael L. Parson
Governor of Missouri
201 W. Capitol Ave. #216
Jefferson City, MO 65101

/s/Jamie L. Boyer
Attorney for Petitioner