

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

FALLS CHURCH MEDICAL CENTER, LLC *et al.*,

Plaintiffs,

v.

M. NORMAN OLIVER, *et al.*,

Defendants.

CASE NO: 3:18-cv-428-HEH

**PLAINTIFFS' MOTION TO JOIN AN ADDITIONAL PARTY
AND AMEND COMPLAINT**

Plaintiffs Falls Church Medical Center, LLC d/b/a Falls Church Healthcare Center; Whole Woman's Health Alliance; All Women's Richmond, Inc. d/b/a A Capital Women's Health Clinic; and Virginia League for Planned Parenthood, through their counsel, file this Motion to Join an Additional Party and Amend Complaint pursuant to this Court's Pretrial Schedule A (Dkt. No. 27-1) and Federal Rules of Civil Procedure 15(a), 20, and 21. For the reasons stated in their accompanying Memorandum in Support, Plaintiffs respectfully seek leave from this Court to add Dr. Jane Doe as an additional Plaintiff in this matter. Plaintiffs' Proposed Amended Complaint is attached as Exhibit A to Plaintiffs' Memorandum in Support. Plaintiffs have attached a Proposed Order as Exhibit B.

Dated: August 16, 2018

Respectfully submitted,

/s/ Gail M. Deady

Jenny Ma*
Gail M. Deady (VSB No. 82035)
Amy Myrick*
CENTER FOR
REPRODUCTIVE RIGHTS
199 Water Street, 22nd Floor
New York, New York 10038
Phone: (917) 637-3600
Fax: (917) 637-3666
Email: jma@reprorights.org
gdeady@reprorights.org

*Attorneys for Plaintiffs Falls
Church Medical Center,
LLC; Whole Woman's Health
Alliance; and All Women's
Richmond, Inc.*

Jennifer Sandman*
PLANNED PARENTHOOD
FEDERATION OF
AMERICA
123 William Street, 9th Floor
New York, New York 10038
Phone: (212) 261-4584
Fax: (212) 247-6811
Email:
jennifer.sandman@ppfa.org

*Attorney for Plaintiff Virginia
League for Planned
Parenthood*

Claire G. Gastanaga (VSB
No. 14067)
Eden B. Heilman**
AMERICAN CIVIL
LIBERTIES UNION
FOUNDATION OF
VIRGINIA, INC.
701 E. Franklin Street,
Suite 1412
Richmond, Virginia 23219
Phone (804) 644-8080
Fax: (804) 649-2733
Email: claire@acluva.org

Attorneys for all Plaintiffs

*Admitted *Pro Hac Vice*.

**Motion for Admission *Pro Hac Vice* to be filed.

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2018, a true and correct copy of the foregoing Plaintiffs' Motion to Join an Additional Party and Amend Complaint was served on counsel for Defendants represented by the Attorney General via the Eastern District of Virginia's Electronic Case Filing System, and mailed to Defendant Robert Tracci pursuant to Federal Rule of Civil Procedure 5(b).

Matthew R. McGuire
Deputy Solicitor General
Office of the Attorney General
202 North Ninth Street
Richmond, VA 23219
mmcguire@oag.state.va.us

Robert N. Tracci
Commonwealth Attorney for the County of Albemarle
410 East High Street
Charlottesville, VA 22902
rtracci@albemarle.org

Dated: August 16, 2018

By: /s/ Gail M. Deady

Gail M. Deady (VSB No. 82035)
CENTER FOR REPRODUCTIVE RIGHTS
199 Water Street, 22nd Floor
New York, NY 10038
Phone: (917) 637-3600
Fax: (917) 637-3666
Email: gdeady@reprights.org