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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

LOURDES MATSUMOTO, NORTHWEST
ABORTION ACCESS FUND, and
INDIGENOUS IDAHO ALLIANCE,

Plaintiffs,

v.

RAÚL LABRADOR, in his capacity as the
Attorney General for the State of Idaho,

Defendant.

Case No. 1:23-cv-00323-DKG

**PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 7.1(b), Plaintiffs Lourdes Matsumoto, Northwest Abortion Access Fund, and Indigenous Idaho Alliance respectfully move this Court for summary judgment on all counts of their Complaint and request entry of judgment in their favor, including declaratory and injunctive relief and an award of attorneys' fees.

In support of this Motion, Plaintiffs have contemporaneously filed a Statement of Undisputed Material Facts, a Memorandum of Law, and the Declaration of Kelly O'Neill, with attached exhibits, providing the evidentiary support for the Statement of Undisputed Material Facts.

DATED: April 16, 2026.

STOEL RIVES LLP

/s/ Wendy J. Olson
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/s/ Jamila A. Johnson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 16, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following persons:

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