

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

A Woman's Concern, Inc. d/b/a Your Options
Medical Centers,

Plaintiff,

vs.

Maura Healey, Governor of Massachusetts,
sued in her individual and official capacities;
Robert Goldstein, Commissioner of the
Massachusetts Department of Public Health,
sued in his individual and official capacities;
Reproductive Equity Now Foundation, Inc.;
Rebecca Hart Holder, Executive Director of
Reproductive Equity Now Foundation,

Defendants.

C.A. No. 1:24-cv-12131-LTS

**DECLARATION OF MARIANA KORSUNSKY, ESQ. IN SUPPORT OF MOTION TO
DISMISS OF DEFENDANTS REPRODUCTIVE EQUITY NOW FOUNDATION, INC.
AND REBECCA HART HOLDER**

I, Mariana Korsunsky, Esq., pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with the firm Goulston & Storrs PC, and counsel of record to Defendants Reproductive Equity Now Foundation, Inc. ("REN") and Rebecca Hart Holder ("Holder") in the above-captioned matter. I am licensed to practice law in the Commonwealth of Massachusetts and am admitted to practice in the United States District Court for the District of Massachusetts. I am familiar with the facts and circumstances of this action.

2. I submit this declaration, along with the exhibits annexed hereto, in support of REN and Holder's Motion to Dismiss and accompanying Memorandum of Law filed contemporaneously herewith.

3. Attached hereto as **Exhibit I** is a true and correct copy of A Woman's Concern,

Inc. d/b/a Your Options Medical Centers' Memorandum in Support of Plaintiff's Motion for Preliminary Injunction filed against the Commonwealth of Massachusetts Board of Registration in Medicine in Middlesex Superior Court on or around July 18, 2024 (Case No. 2481CV01789) (the "PI Motion"). I obtained a copy of the foregoing document from the Massachusetts Trial Court web portal at masscourts.org.

4. Attached hereto as **Exhibit II** is a true and correct copy of the Order dated August 2, 2024 and issued by Justice William F. Bloomer denying YOM's PI Motion. I obtained a copy of the foregoing document from the Massachusetts Trial Court web portal at masscourts.org.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 28, 2024.

/s/ Mariana Korsunsky
Mariana Korsunsky (BBO #675626)
GOULSTON & STORRS PC
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Boston, MA 02109
Tel: (617) 482-1776
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Dated October 28, 2024

CERTIFICATE OF SERVICE

I, Carla A. Reeves hereby certify that on October 28, 2024, I caused the foregoing document to be filed electronically using the Court's CM/ECF system, which will send notification of this filing (NEF) to all registered participants. Paper copies will be sent to those indicated as non-registered participants.

/s/ Carla A. Reeves _____

Carla A. Reeves