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*Attorneys for Plaintiff*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

ST. LUKE'S HEALTH SYSTEM, LTD.,

Plaintiff,

v.

RAÚL LABRADOR, Attorney General of the  
State of Idaho,

Defendant.

Case No. 1:25-cv-00015-BLW

**ST. LUKE'S HEALTH SYSTEM, LTD.'S  
SUPPLEMENT REGARDING SCOPE  
OF ESI PRESERVATION**

As allowed by the Court during the May 7, 2025, scheduling conference and in compliance with Docket Entry Order No. 58, St. Luke's requests that the following items be included in Section I(b)(ii)(1)(a) of the Discovery Plan regarding the scope of ESI preservation:

- the alleged conflict between EMTALA and the Idaho Defense of Life Act;

- the transfer of pregnant patients out of state (including medical records and air traffic control records);
- Plaintiff's claims and Defendant's defenses in this case;
- the lawsuit *United States v. Idaho*, No. 1:22-cv-00329 (D. Idaho);
- the relationship between Medicaid and abortion, including the Hyde Amendment (including documents related to the reimbursement under Medicaid of abortion);
- the Supremacy Clause, federal preemption, and/or the Spending Clause of the U.S. Constitution.

DATED: May 14, 2025

STOEL RIVES LLP

/s/ Wendy J. Olson

Wendy J. Olson

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/s/ Lindsay C. Harrison

Lindsay C. Harrison

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2025, I served a full, true, and correct copy of the foregoing **St. Luke's Health System, Ltd.'s Supplement Regarding Scope of ESI Preservation** on the parties hereto in the manner set forth below:

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