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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-DKG

**MOTION TO EXPEDITE
CONSIDERATION OF ST. LUKE'S
HEALTH SYSTEM'S MOTION FOR
PRELIMINARY INJUNCTION**

Pursuant to District of Idaho Local Rule 6.1 and Federal Rule of Civil Procedure 6(c)(1)(C), St. Luke's Health System, Ltd., respectfully requests expedited treatment of its Motion for Preliminary Injunction. Under these rules, the Court may, for good cause shown, shorten the time period for responding to a motion. Good cause exists here. St. Luke's anticipates that the incoming

administration may shift its legal position and/or dismiss *United States v. Idaho*, No. 22-cv-329. Absent expedited consideration of St. Luke's Motion for Preliminary Injunction, such dismissal would allow Idaho Code § 18-622 to go fully into effect. As detailed in Plaintiff's Motion and the accompanying Declaration of Doctor Stacy Seyb, the last time Idaho's law was not subject to a limiting injunction prohibiting its enforcement to the extent it conflicts with EMTALA, St. Luke's was forced to airlift pregnant patients with medical emergencies out of state for care on a regular basis. The impending expiration of a preliminary injunction that has forestalled such irreparable harm amounts to good cause. *See Robinson v. Labrador*, No. 24-cv-306, 2024 WL 4953686, at *1–2 (D. Idaho Dec. 3, 2024) (noting that court granted motion to expedite consideration of motion to renew a preliminary injunction soon to expire). Moreover, rather than waiting for a change in position by the government in *United States v. Idaho*, Plaintiff brings this Motion now to allow reasonable time for the Court to order briefing and hear arguments in advance of any such change.

Thus, to avoid any lapse in time during which the Idaho law is not enjoined, St. Luke's respectfully requests that the Court set a schedule that would allow for entry of an injunction in this matter prior to the lifting of any injunction in *United States v. Idaho*.

DATED: January 14, 2025

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