

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA

MAYDAY HEALTH and NANCY TURBAK)
BERRY,)

Plaintiffs,)

v.)

LARRY R. RHODEN, Governor for the)
State of South Dakota, and MARTY J.)
JACKLEY, Attorney General for the)
State of South Dakota, in their)
official capacities,)

Defendants.)

4:24-CV-04096-CCT

NOTICE OF EXPERT WITNESS

COMES NOW, Governor Larry Rhoden and Attorney General Marty Jackley, Defendants, by and through their undersigned counsel, Amanda Miiller, Deputy Attorney General, and hereby notifies the Court and Plaintiffs that it anticipates calling the following individual as an expert witness in the above-entitled case:

1. **Dr. Patricia Giebink**

Witness Qualifications: Dr. Giebink’s Curriculum Vitae is attached and marked as Exhibit 1.

Anticipated Testimony: Dr. Giebink will testify to the FDA approved medical label for Mifepristone including contraindications, side effects, and recommended uses; the FDA approved medical label for Misoprostol including contraindications, side effects, and recommended uses; risks associated with unapproved and misbranded drugs; fetal size and the difference between last menstrual period, gestational age, and

ultrasound; statistical abortion data; experiences at the Alpha Center related to abortion pills; informed consent; and other information contained with her affidavit filed with this Court.

Exhibits: Dr. Giebink will testify to exhibits E, S, W, X, CC, DD, EE, FF, GG, and HH.

Publications: Unexpected Choice (2021) — Focus on the Family / Tyndale House Publishers

Compensation: Flat Fee for consultation, review, research, preparation, travel, and testimony - \$5,000

Dated this 20th day of June, 2026.

/s/ Amanda Müller
Amanda Müller
Deputy Attorney General
Office of the Attorney General
1302 East SD Highway 1889, Suite 1
Pierre, South Dakota 57501-8501
Telephone: (605) 773-3215
Email: amanda.müller@state.sd.us

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2026, I electronically filed the foregoing with the Clerk of the Court for the United States District Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/Amanda Müller
By: Amanda Müller
Deputy Attorney General

CURRICULUM VITAE FOR LEGAL TESTIMONY

Patricia K. Giebink, M.D.

IDENTIFICATION

Name: Patricia K. Giebink, M.D.

Profession: Physician (Obstetrics and Gynecology – Retired)

State of Licensure: South Dakota (1991–2024)

Primary Residence: Chamberlain, South Dakota

PROFESSIONAL SUMMARY

Dr. Patricia K. Giebink is a retired, board-certified obstetrician-gynecologist with over 30 years of clinical experience in women’s healthcare. Her professional background includes private practice, hospital-based obstetrics, academic medicine, and service in both domestic and international medical settings. She held admitting privileges in nearly a dozen hospitals across South Dakota and served as an attending physician for the University of South Dakota School of Medicine.

Dr. Giebink also previously worked at Planned Parenthood, the only abortion clinic in South Dakota at the time, giving her direct professional experience relevant to matters involving abortion practice, standards of care, and medical ethics. She is the author of *Unexpected Choice* and frequently provides expert education on women’s health and obstetrical care.

EDUCATION AND TRAINING

Internship and Residency, Obstetrics and Gynecology

Indiana University Medical Center, Indianapolis, Indiana (1987–1991)

Doctor of Medicine (M.D.)

University of South Dakota School of Medicine, Vermillion and Sioux Falls, South Dakota (1982–1987)

Master of Science, Physical Education and Exercise Physiology

Montana State University, Bozeman, Montana (1975–1976)

Bachelor of Arts, cum laude, Physical Education and Health

Augustana College, Sioux Falls, South Dakota (1968–1972)

LICENSURE AND CERTIFICATION

Life Fellow, American College of Obstetricians and Gynecologists (2020–Present)

Board Certified, American Board of Obstetrics and Gynecology (1994–2020)

EXHIBIT

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Medical License, State of South Dakota (1991–2024)
Medical License, State of Missouri (2011–2014)
National Board of Medical Examiners – Parts I, II, III, IV (1985–1990)

ACADEMIC APPOINTMENTS

Attending Physician, University of South Dakota School of Medicine
Sioux Falls, South Dakota (1992–1998)

CLINICAL EXPERIENCE

Private Practice, Obstetrics and Gynecology – Sioux Falls, South Dakota
Hospital-Based Obstetrics and Gynecology – Multiple South Dakota hospitals
Locum Tenens Obstetrics – Statewide South Dakota
International Medical Practice – Oasis Hospital, United Arab Emirates
Gynecology Practice – Planned Parenthood Clinic, Sioux Falls, South Dakota

HOSPITAL PRIVILEGES (HISTORICAL)

Sanford Chamberlain Medical Center; Madison Community Hospital; Brookings Health System; Prairie Lakes Hospital; Mid Dakota Hospital; Sioux Valley Hospital; McKennan Hospital; Oasis Hospital (UAE)

PROFESSIONAL SOCIETIES

American College of Obstetricians and Gynecologists (Fellow)
South Dakota State Medical Association
American Association of Pro-life Obstetricians and Gynecologists
Sixth District Medical Society
Former Member: Seventh District Medical Society; American Medical Women’s Association

HONORS, LEADERSHIP, AND APPOINTMENTS

Executive Board Member, Alpha Center, Sioux Falls, South Dakota
District Six Director and Executive Board Member, AAPLOG
South Dakota Section Chair and Vice-Chair, ACOG
Appointed Member, ACOG Committee on American Indian and Alaskan Native Affairs
South Dakota Representative to ACOG Legislative Workshops
Leadership in Women’s Health Policy Conference, UNC–Chapel Hill

PUBLICATIONS

Giebink, P.K. *Unexpected Choice: An Abortion Doctor’s Journey to Pro-Life.* Focus on the Family / Tyndale House Publishers.
Author of peer-reviewed medical journal articles.