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 Attorney for Defendant Cara M. Christ,
 Director of the Arizona Department of Health Services
 in her official capacity

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

Planned Parenthood Arizona, Inc.; Eric
 Reuss, M.D., M.P.H.; Paul A. Issacson,
 M.D., Desert Star Family Planning, LLC;
 Deshawn Taylor, M.D.,
 Plaintiffs,

v.

Mark Brnovich, Arizona Attorney General,
 in his official capacity, Cara M. Christ,
 Director of the Arizona Department of
 Health Services, in her official capacity;
 Patricia E. McSorley, Executive Director of
 the Arizona Medical Board, in her official
 capacity; Richard T. Perry, M.D. Medical
 Board Chair, in his official capacity; James
 Gillard M.D., Medical Board Vice Chair, in
 his official capacity; Jodi A. Bain, Medical
 Board Member, in her official capacity;
 Marc D. Berg, M.D., Medical Board
 Member, in his official capacity; Donna
 Brister, Medical Board Member, in her
 official capacity; R. Screven Farmer, M.D.,
 Medical Board Member, in his official
 capacity; Gary R. Figge, M.D. Medical
 Board Member, in his official capacity;
 Robert E. Fromm, M.D., Medical Board
 Member, in his official capacity; Paul S.
 Gerding, Medical Board Member, in his
 official capacity; Lois Krahn, M.D. Medical
 Board Member, in her official capacity;
 Edward G. Paul, M.D. Medical Board
 Member, in his official capacity; Wanda J.
 Salter, Medical Board Member, in her
 official capacity; Jenna Jones, Executive
 Director of the Arizona Board of
 Osteopathic Examiners in Medicine and
 Surgery, in her official capacity; Scott
 Steingard, D.O., Board of Osteopathic

SETTLEMENT AGREEMENT

Case CV-15-01022-PHX-SPL

Examiners in Medicine and Surgery
 President, in his official capacity; Douglas
 Cunningham, D.O.; Board of Osteopathic
 Examiners in Medicine and Surgery Vice
 President, in his official capacity; Gary
 Erbstoesser, D.O., Board of Osteopathic
 Examiners in Medicine and Surgery
 Member, in his official capacity; Jerry G.
 Landau, Board of Osteopathic Examiners in
 Medicine and Surgery Member, in his
 official capacity; Martin B. Reiss, D.O.
 Board of Osteopathic Examiners in
 Medicine and Surgery Member, in his
 official capacity; Lew Riggs, Board of
 Osteopathic Examiners in Medicine and
 Surgery Member, in his official capacity;
 Vas Sabeeh, D.O., Board of Osteopathic
 Examiners in Medicine and Surgery
 Member, in his official capacity,

Defendants.

THIS AGREEMENT is made as of the _____ day of October, 2017, by and
 between Planned Parenthood Arizona, Inc.; Eric Reuss, M.D., M.P.H.; Paul A. Isaacson,
 M.D., Desert Star Family Planning, LLC; DeShawn Taylor, M.D (“Plaintiffs”) and Mark
 Brnovich, Arizona Attorney General, in his official capacity; Cara M. Christ, Director of
 the Arizona Department of Health Services, in her official capacity; Patricia E. McSorley,
 Executive Director of the Arizona Medical Board, in her official capacity; Richard T.
 Perry, M.D. Medical Board Chair, in his official capacity; James Gillard M.D., Medical
 Board Vice Chair, in his official capacity; Jodi A. Bain, Medical Board Member, in her
 official capacity; Marc D. Berg, M.D., Medical Board Member, in his official capacity;
 Donna Brister, Medical Board Member, in her official capacity; R. Screven Farmer, M.D.,
 Medical Board Member, in his official capacity; Gary R. Figge, M.D. Medical Board
 Member, in his official capacity; Robert E. Fromm, M.D., Medical Board Member, in his
 official capacity; Paul S. Gerding, Medical Board Member, in his official capacity; Lois

1 Krahn, M.D. Medical Board Member, in her official capacity; Edward G. Paul, M.D.
2 Medical Board Member, in his official capacity; Wanda J. Salter, Medical Board Member,
3 in her official capacity; Jenna Jones, Executive Director of the Arizona Board of
4 Osteopathic Examiners in Medicine and Surgery, in her official capacity; Scott Steingard,
5 D.O., Board of Osteopathic Examiners in Medicine and Surgery President, in his official
6 capacity; Douglas Cunningham, D.O.; Board of Osteopathic Examiners in Medicine and
7 Surgery Vice President, in his official capacity; Gary Erbstoesser, D.O., Board of
8 Osteopathic Examiners in Medicine and Surgery Member, in his official capacity; Jerry G.
9 Landau, Board of Osteopathic Examiners in Medicine and Surgery Member, in his official
10 capacity; Martin B. Reiss, D.O. Board of Osteopathic Examiners in Medicine and Surgery
11 Member, in his official capacity; Lew Riggs, Board of Osteopathic Examiners in
12 Medicine and Surgery Member, in his official capacity; Vas Sabeeh, D.O., Board of
13 Osteopathic Examiners in Medicine and Surgery Member, in his official capacity,
14 (“Defendants”).

18 Agreement

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20 1. Plaintiffs and Defendants are parties to a certain action in the District Court
21 of Arizona, Case No. 2:15-CV-01022-SPL. A final judgment has been entered by the Court.

22 2. Purpose of Agreement. The parties have entered into this Settlement to
23 resolve the Judgment and to end all aspects of the case. Neither Plaintiffs nor Defendants
24 have filed a Notice of Appeal in this action and neither shall file such notice. This agreement
25 is intended to fully and finally resolve any and all matters pertaining to the above-referenced
26 case number.
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3. Monetary Consideration to Plaintiffs. Defendants shall pay Plaintiffs \$550,000.00. Plaintiffs shall allocate these funds at their sole discretion and without notice to Defendants or to the Court.

4. Satisfaction. Within 10 days of receipt of good funds, Plaintiffs shall cause to be filed a satisfaction of Judgment in a form acceptable to Defendants.

5. No other actions. No actions will be taken by the parties to this matter, except to enforce the terms of this settlement agreement.

6. The attorneys signing below have authority to enter this agreement on behalf of all Plaintiffs and Defendants.

DATED this ____ day of October, 2017.

PLANNED PARENTHOOD
FEDERATION OF AMERICA

MUELLER & DRURY, P.C.

By /s/Diana Salgado By s/Douglas V. Drury

Diana Salgado
On Behalf of Planned Parenthood
Arizona, Inc.

Douglas V. Drury
Defendants

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION

By /s/ Andrew Beck
Andrew Beck
On behalf of Eric Reuss, M.D., M.P.H.;
Desert Star Family Planning, LLC;
DeShawn Taylor, M.D.

CENTER FOR REPRODUCTIVE
RIGHTS

By /s/ David Brown
David Brown
On behalf of Paul A. Isaacson, M.D.

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