

John H. Robinson, WSB #6 – 2828
Marci C. Bramlet, WSB #7 – 5164
ROBINSON BRAMLET LLC
172 Center Street, Suite 202
P.O. Box 3189
Jackson, Wyoming 83001
Telephone: 307.733.7703
Facsimile: 307.201.5546
john@jrmcb.com
marci@jrmcb.com

Peter S. Modlin (Cal. Bar # 151453)
Admitted pro hac vice
GIBSON DUNN & CRUTCHER, LLP
555 Mission Street, Suite 3000
San Francisco, California 94105
Telephone: 415.393.8392
pmodlin@gibsondunn.com

Megan Cooney (Cal. Bar # 295174)
Admitted pro hac vice
GIBSON DUNN & CRUTCHER, LLP
3161 Michelson Drive
Irvine, CA 92612-4412
Telephone: 949.451.4087
mcooney@gibsondunn.com

Attorneys for Plaintiffs

**IN THE DISTRICT COURT OF THE NINTH JUDICIAL DISTRICT
IN AND FOR TETON COUNTY, WYOMING**

| | | |
|---------------------------|---|----------------|
| DANIELLE JOHNSON, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Case No. 18853 |
| |) | |
| STATE OF WYOMING, et al., |) | |
| |) | |
| Defendants. |) | |

EXPERT WITNESS DESIGNATION

COME NOW Plaintiffs, by and through undersigned counsel, and hereby submit this

Expert Witness Designation as follows:

RETAINED EXPERTS

1. **Dr. Ghazaleh Moayedi**

Dr. Ghazaleh Moayedi has been retained by Plaintiffs to offer expert opinions on the medical meaning (or lack thereof) of key terms in the abortion statutes and the impact of Wyoming's abortion statutes on physicians and women, as well as opinions on abortions, abortion medication, obstetrics and gynecology, and the impacts of laws restricting abortion. She is expected to provide testimony consistent with her written report, attached hereto as Exhibit A. Her opinions are based on her education, training, research, scholarship, and professional experience, as well as the information and materials referenced in her report. She is not currently expected to use any exhibits to summarize or support her opinions.

Dr. Moayedi received her Doctorate of Osteopathy from the University of North Texas Health Sciences Center in Fort Worth, Texas; she completed her residency in Obstetrics and Gynecology at the Texas Tech University Health Science Center; she received a Master's Degree in Public Health at the University of Hawai'i at Mānoa in Honolulu, Hawai'i; and she completed a fellowship in Complex Family Planning at the University of Hawai'i at Mānoa John A. Burns School of Medicine. She has not testified as an expert in any prior case. She receives \$500 per hour for her work. Her CV, which includes a full list of her qualifications and publications, is attached as Exhibit B.

2. **Professor Rebecca Peters**

Professor Rebecca Peters has been retained by Plaintiffs to offer expert opinions on the religious origins and history of religious beliefs on when life begins and on abortion. She is expected to provide testimony consistent with her written report, attached hereto as Exhibit C. Her opinions are based on her education, training, research, scholarship, and professional experience,

as well as the information and materials referenced in her report. She is not currently expected to use any exhibits to summarize or support her opinions.

Professor Peters is a Professor of Religious Studies at Elon University. She received two B.A. degrees from Rhodes College and a Master of Divinity, M. Phil., and Ph.D. in Christian Social Ethics from the Union Theological Seminary in New York. She is an ordained minister of Word and Sacrament in the Presbyterian Church (U.S.A.) and she has represented the Presbyterian Church (U.S.A.) as a member of the Faith and Order Standing Commission (“Faith and Order”) of the World Council of Churches (“WCC”) since 2006.

She testified in *Jane Doe No. 1, et. al v. Attorney General of Indiana, et. al.*, No. 1:20-cv-03247-RLY-MJD (S.D. Ind. Sept. 26, 2022). She receives \$200 per hour for consulting work and \$1000 per day for travel or testimony. Her CV, which includes a full list of her qualifications and publications, is attached as Exhibit D.

3. Rabbi Danya Ruttenberg

Rabbi Danya Ruttenberg has been retained by Plaintiffs to offer expert opinions on the origins and history of Jewish beliefs on when life begins and on abortion. She is expected to provide testimony consistent with her written report, attached hereto as Exhibit E. Her opinions are based on her education, training, research, scholarship, and professional experience, as well as the information and materials referenced in her report. She is not currently expected to use any exhibits to summarize or support her opinions.

Rabbi Ruttenberg received a B.A. in Religious Studies from Brown University, and a Master of Rabbinics and her Rabbinic Ordination from American Jewish University. She has

written or co-authored eight books related to religion or the Jewish faith and she has served as a Rabbinic Consultant to several national Jewish advocacy organizations.

Rabbi Ruttenberg has not testified as an expert in any prior case. She receives \$200 per hour for consulting work and \$1000 per day for travel or testimony. Her CV, which includes a full list of her qualifications and publications, is attached as Exhibit F.

4. **Michael A. Blonigen**

Michael Blonigen has been retained by Plaintiffs to offer expert opinions on the difficulties prosecutors would experience with enforcement of the abortion statutes/bans. He is expected to provide testimony consistent with his written report, attached hereto as Exhibit G. His opinions are based on his education, training, research, scholarship, and professional experience, as well as the information and materials referenced in his report. He is not currently expected to use any exhibits to summarize or support his opinions. His CV is attached as Exhibit H.

Mr. Blonigen received a B.A. with Honors in History, and a Juris Doctorate from the University of Wyoming.

Mr. Blonigen testified as an expert in the case of Board of Prof. Resp. v. Hinckley, 503 P.3d 584 (Wyo. 2022); D-21-8003. He receives \$150 per hour for his work. His listing of qualifications is included within his report.

NON-RETAINED EXPERTS

5. **Dr. Giovannina Anthony**

Dr. Giovannina Anthony is a plaintiff in this action and an Obstetrics and Gynecology specialist located in Jackson, Wyoming. She provides her patients the full range of gynecologic and obstetrics care, including medication abortions. She may provide opinions on the medical meaning (or lack thereof) of key terms in the abortion statutes, the impact of the statutes on her, her patients, physicians and Wyoming women, as well as opinions on abortions, abortion

medication, and obstetrics and gynecology. She is expected to provide testimony consistent with the affidavits/declarations she has submitted in this action and the prior action challenging Wyoming's Trigger Ban (Case No. 18732). Her opinions are based on her education, training, research, scholarship, and professional experience, as well as the information and materials referenced in her affidavits/declarations.

6. Julie Burkhart

Julie Burkhart is the founder and president of plaintiff Wellspring Health Access, which provides abortion care, family-planning services, gender-affirming care and gynecological care. She may provide opinions on abortion services and the impact of Wyoming's abortion statutes on her organization, physicians, patients, and Wyoming women. She is expected to provide testimony consistent with the affidavits/declarations she has submitted in this action and the prior action challenging Wyoming's Trigger Ban (Case No. 18732). Her opinions are based on her education, training, research, scholarship, and professional experience, as well as the information and materials referenced in her affidavits/declarations.

7. Dr. Rene Hinkle

Dr. Rene Hinkle is a plaintiff in this action and an Obstetrics and Gynecology specialist practicing with Cheyenne Women's Clinic. She provides her patients full obstetric services and primary gynecology and surgery. She may provide opinions on the medical meaning (or lack thereof) of key terms in the abortion statutes, the impact of Wyoming's abortion statutes on her, her patients, the medical community, and Wyoming women, as well as opinions on abortions, abortion medication, and obstetrics and gynecology. She is expected to provide testimony consistent with the affidavits/declarations she has submitted in this action and the prior action

challenging Wyoming's Trigger Ban (Case No. 18732). Her opinions are based on her education, training, research, scholarship, and professional experience.

8. Christine Lichtenfels

Christine Lichtenfels is Executive Director of plaintiff Chelsea's Fund, which provides funding and other logistical support for access to abortion services. She may provide opinions on abortion services and the impact of Wyoming's abortion statutes on her organization, physicians, patients, and Wyoming women. She is expected to provide testimony consistent with the affidavits/declarations she has submitted in this action and the prior action challenging Wyoming's Trigger Ban (Case No. 18732). Her opinions are based on her education, training, research, scholarship, and professional experience.

DATED: August 2, 2023

Respectfully submitted,

By:



John H. Robinson, WSB #6 – 2828
Marci C. Bramlet, WSB #7-5164
ROBINSON BRAMLET LLC
172 Center Street, Suite 202
P.O. Box 3189
Jackson, Wyoming 83001
Telephone: 307.733.7703
Facsimile: 307.201.5546
john@jrmcb.com
marci@jrmcb.com

Peter S. Modlin (Cal. Bar # 151453)
Admitted pro hac vice
GIBSON DUNN & CRUTCHER, LLP
555 Mission Street, Suite 3000
San Francisco, California 94105
Telephone: 415.393.8392
pmodlin@gibsondunn.com

Megan Cooney (Cal. Bar # 295174)
Admitted pro hac vice
GIBSON DUNN & CRUTCHER, LLP
3161 Michelson Drive,
Irvine, CA 92612-4412
Telephone: 949.451.4087
mcooney@gibsondunn.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that this 2nd day of August 2023, a true and correct copy of the foregoing was served as follows:

Jay Arthur Jerde [] U.S. MAIL
Wyoming Attorney General's Office [] FED EX
109 State Capitol [] FAX
Cheyenne, WY 82001 [] ECF
Jay.jerde@wyo.gov [✓] E-MAIL
Attorney for Defendants Mark Gordon, Bridget Hill

Erin E. Weisman [] U.S. MAIL
Teton County Attorney's Office [] FED EX
P.O Box 4068 [] FAX
Jackson, WY 83002 [] ECF
eweisman@tetoncountywy.gov [✓] E-MAIL
Attorney for Defendant Matthew Carr

Lea M. Colasuonno [] U.S. MAIL
Town of Jackson [] FED EX
P.O Box 1687 [] FAX
Jackson, WY 83001 [] ECF
lcolasuonno@jacksonwy.gov [✓] E-MAIL



John H. Robinson
Marci Crank Bramlet