

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO. 2022-05633

DIVISION N-8

JUNE MEDICAL SERVICES, LLC D/B/A HOPE MEDICAL GROUP FOR WOMEN,  
KATHALEEN PITTMAN, AND MEDICAL STUDENTS FOR CHOICE, ON BEHALF OF  
ITSELF AND ITS MEMBERS

VERSUS

JEFF LANDRY, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF  
LOUISIANA, AND COURTNEY N. PHILLIPS, IN HER OFFICIAL CAPACITY AS  
SECRETARY OF THE LOUISIANA DEPARTMENT OF HEALTH

**AFFIDAVIT OF ALEXANDRA W. BAND, D.O., FACOG, IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

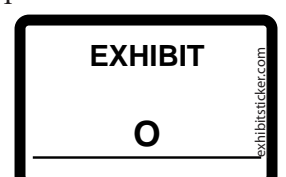
I, ALEXANDRA W. BAND, D.O., FACOG, hereby affirm under penalty of perjury that the following statements are true and correct:

1. I am board certified in obstetrics and gynecology (“OB/GYN”), and a medical doctor licensed in Louisiana and in good standing with the Louisiana State Board of Medical Examiners.

2. I received my undergraduate degree from Middlebury College, and received my Doctor of Osteopathic Medicine in 2010 from the Oklahoma State University College of Health Sciences. After medical school, I was a resident in the Obstetrics and Gynecology department at Ochsner Clinic Foundation in New Orleans, Louisiana from 2010-2014. I now work as an associate professor and physician in Orleans Parish. I am also a Fellow of the American College of Obstetricians and Gynecologists. My qualifications are described in detail in my curriculum vitae, a copy of which is attached as Exhibit 1.

3. In my clinical practice, I care for many Louisiana patients ranging from well-woman visits to prescribing birth control, to care of pregnant women which, sadly, also means both medical and surgical management of miscarriages, for which the medical term is spontaneous abortion.

4. In my view, Louisiana’s Trigger Bans are very dangerous. In the past few weeks alone, but amplified in the last week, I have gotten so many questions about the laws and how they might affect patients and doctors. There are so many misconceptions and unknowns too—especially because the term abortion as used by doctors are really different than how they show up in laws, including in the Trigger Bans. This makes every patient visit a risky proposition for a healthcare provider. For example, if someone was experiencing bleeding, at what point could a



the patient’s life was at jeopardy? Or if the patient might lose her uterus? At the point of when the patient will end up being infertile?

5. Patients have also been terrified, asking about whether they might be prosecuted, and if they can have an abortion or wait to miscarry and just bleed enough and be sick sufficiently to get care. I have had more people requesting tubal ligation and asking whether they should remove their IUDs.

6. Recently, since the Supreme Court’s decision, I have become deeply concerned about the ways in which the Trigger Laws are affecting patient care. It is my usual practice to prescribe Cytotec for a variety of reasons: including prior to inserting an IUD to make it less painful on the patient, for people experiencing miscarriage and prefer medications rather than a dilation and curettage procedure, but now pharmacies are refusing to prescribe medicine—because they are afraid of what the Trigger Laws mean.

7. Specifically, just after the *Dobbs* decision, after a patient sought to fill her prescription for Cytotec, Walgreens called my office. They asked if the prescription was for an abortion. And when the response was no, it’s prescribed for IUD insertion to make it less painful, the response from Walgreens was that it would still not be filling the prescription because they could not be sure we weren’t prescribing this for an abortion, and so they will no longer dispense the drug. For obvious reasons, this is interfering with the best, medically appropriate care I can give to my patients, and interferes with my medical judgment and my patient-doctor relationships.

8. This past week alone since the decision has engendered these result, I know the devastation that will occur to my patients if the Trigger laws are not enjoined. I submit this affidavit in support of Plaintiffs’ Motion for Preliminary Injunction.

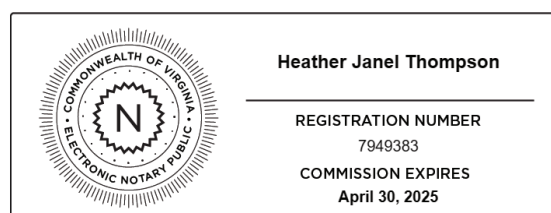
On this 4th day of July, 2022, the undersigned, who having been first duly sworn, attests to the contents of this affidavit.

*Alexandra W Band, DO*, FACOG  
Alexandra W. Band, D.O., FACOG

*Heather Janel Thompson*  
NOTARY PUBLIC

Sworn to and subscribed before me  
this 4th day of July, 2022

Heather Janel Thompson  
Electronic Notary Public



Notarized online using audio-video communication