IN THE IOWA DISTRICT COURT FOR POLK COUNTY

PLANNED PARENTHOOD OF THE HEARTLAND, INC., EMMA GOLDMAN CLINIC, and JILL MEADOWS. M.D., Petitioners, v. KIM REYNOLDS ex rel. STATE OF IOWA and IOWA BOARD OF MEDICINE, Respondents.	No. EQCE 083074 **SURREPLY IN OPPOSITION TO RESPONDENTS' MOTION TO DISSOLVE PERMANENT INJUNCTION**

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INTRODUCTION

On September 26, 2022, Respondents Kim Reynolds ex rel. State of Iowa and the Iowa Board of Medicine (collectively, "the State") filed a Reply Brief in support of its Motion to Dissolve the permanent injunction. The Reply Brief raises several new arguments and relies heavily on several Iowa decisions not cited in its initial brief. For the first time, the State argues that under Iowa law, the Court has the "inherent authority" to modify or vacate an injunction. It dedicates multiple pages of the reply brief to analyzing three Iowa cases not cited previously: *Spiker v. Spiker*, 708 N.W.2d 347 (Iowa 2006); *Iowa Elec. Light & Power Co. v. Inc. Town of Grand Junction*, 264 N.W. 84 (Iowa 1935); and *Wilcox v. Miner*, 205 N.W. 847 (Iowa 1925). The State also argues for the first time that this Court should allow enforcement of the Ban under the undue burden standard. It cites Chief Justice Roberts's opinion in *Dobbs v. Jackson Women's Health Organization* concurring in the judgment, which not a single other justice joined, which suggested that a pre-viability 15-week ban could satisfy a modified version of the undue burden test, 597 U.S. __, 142 S. Ct. 2228, 2315, 213 L.Ed.2d 545 (2022) (Roberts, C.J., concurring in the judgment). The State suggests that under such a test, a six-week abortion ban could also be constitutional. And for the first time, the State suggests that further factual development is necessary to determine whether the Ban is unconstitutional under this new purported undue burden test that no court has applied (let alone to uphold a six-week ban).

As discussed at length in the opposition brief filed by Petitioners Planned Parenthood of the Heartland, Inc. ("PPH"), the Emma Goldman Clinic ("EGC") and Jill Meadows, M.D., (collectively, "Plaintiffs"), *PPH IV* held that the undue burden standard applies, and the Ban remains unconstitutional. Opp. to Mot. to Dissolve Permanent Inj. ("Opp. Br.") at 12–15. The analysis should end there. But even if there were a change in the law, the State has not shown that, despite the lack of authority in the Iowa Civil Rules of Procedure for its motion, this Court

has inherent authority to dissolve the permanent injunction in this case. Its newly cited cases are inapposite. *Spiker* is a family law case that carves out a narrow exception to Rules 1.1012–13 for child custody orders. *Iowa Electric* and *Wilcox* both predate the promulgation of the Iowa Rules of Civil Procedure in 1943, which superseded the statutory framework governing motions to vacate or modify judgments. Accordingly, Rules 1.1012–13 govern, and no judicially recognized exceptions to these Rules apply in this case. And to the extent the State seeks further factual development under the undue burden standard, its request should be denied.

ARGUMENT

In *PPH IV, Planned Parenthood of the Heartland, Inc. v. Reynolds ex rel. State*, 975 N.W.2d 710 (Iowa 2022), *reh'g denied* (July 5, 2022) ("*PPH IV*"), the Iowa Supreme Court stated that "the *Casey* undue burden test . . . remains the governing standard" for evaluating abortion restrictions under the Iowa Constitution. *Id.* at 716. The court instructed the parties on remand to "marshal and present evidence under that test," but noted that "the legal standard may also be litigated further." *Id.* The State points to this language to suggest that the *PPH IV* court left open the issue of the applicable standard and, astonishingly, asserts that "[t]he Iowa Supreme Court has never said what level of review applies" to gestational age bans. Reply Br. at 24. The State also claims that Plaintiffs erroneously rely "entirely on a portion of a single sentence." Reply Br. at 19. That single sentence is *PPH IV*'s announcement of the applicable legal standard where—contrary to the State's assertion—the Iowa Supreme Court did say what level of review applies. The statement of the legal standard was necessary to decide the case, and it is binding precedent. *See State v. Iowa Dist. Ct. for Polk Cnty.*, 492 N.W.2d 666, 667 (Iowa 1992) ("To sustain a claim of binding precedent, a prior appellate opinion must be interpreted in reference to the question that necessarily had to be decided in that case.").

I. The State Has Not Established That This Court Has Inherent Authority to Dissolve the Permanent Injunction

Under the undue burden standard announced in *PPH IV*, the Ban remains unconstitutional. But even if there were a change in the law, the Court does not have the authority to dissolve the permanent injunction. Rule 1.1012 provides that a court may modify or vacate a judgment for an enumerated set of reasons "[u]pon timely petition and notice under rule 1.1013," Iowa R. Civ. P. 1.1012, and Rule 1.1013 requires a motion to modify or vacate to be "filed and served in the original action within one year after the entry of the judgment or order involved," Iowa R. Civ. P. 1.1013. The State' newly cited cases—*Spiker*, *Iowa Electric*, and *Wilcox*—do not change this analysis. And contrary to the State's argument that the Court's equitable powers grant it broad authority to modify or vacate injunctions, Iowa courts have cited the Court's inherent authority at equity to carve out a narrow equitable exception to Rules 1.1012–13 that does not apply here.

A. *Spiker* establishes a narrow exception to Rule 1.1012 for child custody cases and does not apply here.

The State asserts that in *Spiker*, the Iowa Supreme Court "reaffirmed" that a change in circumstances "usually" permits an application for a modification of the judgment. Reply Br. at 12.[1] It misreads *Spiker*. In that family law case, a custodial parent sought to modify a grandparent visitation order more than two years after the entry of the order because the provision of the grandparent visitation statute on which the order was based had been held to be unconstitutional. 708 N.W.2d at 350, 355 n.2. The parties disagreed about whether the visitation order was a "final" judgment that barred modification of the order under the doctrine of claim preclusion. *Id.* at 354.

[1] The *Spiker* court never uses the word "usually."

The *Spiker* court acknowledged that "[t]here is no specific statutory authority for courts to modify grandparent visitation decrees," but ultimately permitted modification because a child custody order was involved. *Id.* It noted its "general view that courts have inherent authority to modify decrees concerning custody and visitation of children based on a substantial change in circumstances," and held that a "relaxation of the res judicata standard in child custody cases is required because [the court's] goal in such cases is always to serve the best interests of the child, which may require court supervision and modification throughout the child's minority." *Id.* at 355, 356 (citing, *inter alia*, *Linder v. Linder*, 348 Ark. 322, 72 S.W.3d 841, 850 (2002) ("[C]ustody orders are subject to modification in order to respond to changed circumstances and the best interest of the child.")). The Court discussed Rule 1.1012, but specifically stated that the defendant parent could not modify the order under that rule because she did not file her petition to modify within one year. *Id.* at 355 n.2. Rather, the modification was under a judicially created exception to the rule that applies in child custody cases.

Spiker allowed modification of an injunction more than a year after it was entered. But it did so on a narrow ground that does not apply to the instant case. Because of the strong policy interest in serving the best interest of the child, the Court carved out a narrow exception to the general rule against modifying judgments. And *Spiker* expressly acknowledged that Rule 1.1012 applied to suits in equity, *id.*, reiterating the general rule that a motion to modify an injunction after one year is untimely.

B. *Wilcox* and *Iowa Electric* also do not allow for modification of the permanent injunction.

Both *Wilcox* and *Iowa Electric* predate the promulgation of the Iowa Rules of Civil Procedure in 1943, 1943 Iowa Acts 278. *Wilcox* was decided in 1925, and *Iowa Electric* in 1935. Before 1943, the rules governing civil procedure were set forth in statutory provisions: Chapter

552 of the Iowa Code governed modification and vacatur of judgments and was entitled "Procedure to Vacate or Modify Judgments." Iowa Code §§ 12787–800 (1939).[2] When the Rules of Civil Procedure were promulgated in 1943, this chapter was replaced by Rules 252–256, which was renumbered as Rule 1.1012 *et seq.* in 2002, *see* Iowa R. Civ. P. (4th ed., 2002).

The comment accompanying the Rules as promulgated in 1943 expressly provides that "Rules 252–256 supersede chapter 552 of the Code." Iowa R. Civ. P. 252 cmt. (1943). When the Rules were promulgated, the legislature included an appendix of superseded provisions, including Section 12787. 1943 Iowa Acts 278 app. I (1943); *see also Atkin v. Westfall*, 17 N.W.2d 532, 535 (Iowa 1945) ("Section 12787, Code 1939, . . . has been superseded by said Rules. . ..The Rules of Civil Procedure now applicable to such proceedings for a new trial are Rules 252 and 253.").[3]

The Rules of Civil Procedure "govern the practice and procedure in all courts of the state, except where they expressly provide otherwise or statutes not affected [by the Rules] provide different procedure in particular courts of cases." Iowa R. Civ. P. 1.101. The Official Comment to Rule 1.101 provides that "[i]n general, the Rules have the force and effect of statutes." *Id.*,

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[2] The 1939 version of the statutes was in effect when the Rules were promulgated in 1943. The versions in effect when *Iowa Electric* was decided in 1935 and when *Wilcox* was decided in 1925 were substantially identical. *Compare* Iowa Code §§ 12787–800 (1939) *with* Iowa Code §§ 12787–800 (1935) *and* Iowa Code §§ 12787–800 (1924).

[3] Although some provisions of the newly promulgated Rules were substantially identical to the statutes they replaced, others were not. In some cases, the Iowa Supreme Court followed pre-1943 precedents to interpret the new Rules, while in other cases, it did not. *Compare, e.g.*, *Windus v. Great Plains Gas*, 122 N.W.2d 901, 909 (Iowa 1963) ("[T]he language of the former statutes, and the present rule on setting aside defaults, varies so much from the former statute on vacation of judgments, and the present Rule 252, that cases in which defaults were annulled are not in point.") *with Swift v. Swift*, 29 N.W.2d 535, 538 (1947) (noting that although "section 12787, Code 1939 . . . was superseded by rule 252[, . . .] the rule is quite similar to the statute and we see no reason for rejecting these precedents") *and Shaw v. Addison*, 18 N.W.2d 796, 799 (Iowa 1945) (comparing § 12787 *et seq.* of the 1939 Code with Rules 252 and 253 and observing that "the code sections and the rules noted are, in substance and effect, the same").

official cmt. (citing *Phillips v. Catterson*, 17 N.W.2d 517 (Iowa 1945)). Accordingly, to the extent that *Wilcox* and *Iowa Electric* conflict with Rules 1.1012–13, the Rules control.

Moreover, the facts of *Wilcox* and *Iowa Electric* are not remotely similar to the circumstances here. In *Wilcox*, the district court permanently enjoined a county treasurer from collecting taxes under a defective statute and "retained jurisdiction to make further orders" in the case. 205 N.W. at 847. The legislature then passed a "curative act . . . attempting to cure prior defects in the statute and to legalize the prior levy of taxes thereunder." *Id.* Less than a year after the injunction was entered, the county treasurer defendant filed a motion to modify the injunction to permit him to collect taxes under the curative statute. Notably, the parties did not dispute that the court does *not* "ha[ve] power to vacate or modify a decree in equity adjudicating vested private rights after the term at which it was entered in a proceeding." *Id.* at 848. Carving out an exception to this general rule, the Iowa Supreme Court held that the trial court had jurisdiction to modify the injunction "to modify its previous holding to conform to a valid legalizing act." *Id.*

Iowa Electric dealt with a factual situation similar to *Wilcox*. The trial court in *Iowa Electric* enjoined a municipal contract concerning the construction of a power plant, and the legislature subsequently passed a "legalizing act . . . purporting to make legal and valid the contract." 264 N.W. at 85. Less than a year after the injunction was entered, defendants moved to modify the injunction based on the "curative act." *Id.* The Iowa Supreme Court's opinion in this case dealt solely with the plaintiff's challenge to the legality of the curative act. The plaintiff did not argue that the trial court had no authority to modify the injunction, and therefore the Iowa Supreme Court did not address that issue.

Wilcox and *Iowa Electric* are thus distinguishable from the instant case on many fronts. Unlike in *Wilcox*, the Court here did not expressly retain jurisdiction over the permanent

injunction. And the State does not request a modification to conform with a "valid legalizing act" of the legislature. Indeed, as Plaintiffs pointed out in their opposition brief, the State may petition the current Iowa Legislature to pass another six-week ban now, Opp. Br. at 16; such a statute would be analogous to the legalizing acts in *Wilcox* and *Iowa Electric*. The Court should not permit the State to circumvent this step.

Further—unlike here, where the trial court's injunction was entered nearly *three* years ago—the motions to modify in these two cases were brought *within a year* of the entry of the injunction–consistent with the time limit in Rules 1.1012–13, so the defendants in those cases would not have had any basis to argue that the motions to modify were time-barred. Notably, the cases do not discuss a court's "inherent" authority to modify an injunction and do not address the scope of the powers of courts sitting in equity.[4] Accordingly, separate from the fact that *Wilcox* and *Iowa Electric* predate the 1943 promulgation of the Rules of Civil Procedure, their holdings are narrow and do not support the State's argument that the Court may dissolve the permanent injunction notwithstanding Rule 1.1012–13.

C. Iowa courts have recognized a narrow equitable exception to Rules 1.1012–13, but that exception does not apply here.

Recognizing that courts have inherent equitable powers, Iowa courts have applied a narrow equitable exception to Rule 1.1013's one-year limit on vacating judgments. But contrary to the State's position that the Court should ignore the Rules and assert wide-ranging authority to modify or vacate injunctions, Iowa courts have applied this exception narrowly to prevent it from swallowing the Rules. In *Shaw v. Addison*, 18 N.W.2d 796 (Iowa 1945), decided shortly after the Rules were promulgated, the Iowa Supreme Court addressed Rule 1.1013's one-year limit. In

[4] The portion of the State' Reply Brief discussing the nature of injunctive relief does not include a single citation to any Iowa statute or rule, and the only case it discusses is *Spiker*, which as shown above, is limited to child custody cases. Reply Br. at 14–16.

that case, the party seeking modification expressly tried to characterize its motion as "a petition in a suit in equity seeking to vacate the judgment under the broad general powers of a court of equity, independently of" Rules 252 and 253 (the predecessors of Rules 1.1012 and 1.1013). *Id.* at 801. The court explained:

> It has been the uniform holding of this court that where the petitioner has not in the exercise of proper diligence discovered the fraud or other grounds upon which he relies within the year after the entry of final judgment or decree, he may institute suit in equity invoking the equitable powers of the court to vacate the judgment or grant him a new trial, after the time fixed in the statute for so doing has passed. But while the proceeding is in equity we have also uniformly held that *the grounds alleged for the relief must be found among those specified in the statutory provisions noted herein authorizing the relief.*

Id. at 801 (emphasis added). *Shaw* involved an allegation of fraud, and the court added that for the equitable limitation on the Rules to apply, it is "essential that the fraud be extrinsic and collateral to the proceedings and issues in the original case." *Id.*

Citing *Shaw*, Iowa courts have permitted defendants to bring an independent suit in equity to seek modification of a judgment in cases of fraud, which is a basis for vacatur or modification under Rule 1.1012. *See, e.g.*, *Waslick v. Simpson*, 836 N.W.2d 152 (Iowa Ct. App. 2013) (citing *id.*)); *City of Chariton v. J. C. Blunk Const. Co.*, 112 N.W.2d 829, 836 (Iowa 1962) (collecting cases); *Scheel v. Superior Mfg. Co.*, 89 N.W.2d 377, 382 (Iowa 1958) (citing *id.*). And this equitable doctrine extends to "other grounds for vacating the judgment," so long as those other grounds are also "'found among those specified' in Rule 1.1012." *In re Marriage of Rhinehart*, 780 N.W.2d 248, 2010 WL 446560 at *2 (Iowa Ct. App. 2010) (quoting *Johnson v. Mitchell*, 489 N.W.2d 411, 415 (Iowa Ct. App. 1992)). In all of these cases, "[t]he burden upon

one attempting in an equity suit to set aside a judgment or decree and to obtain a new trial is a heavy one." *Shaw*, 18 N.W.2d at 802.[5]

In this case, there is no allegation of fraud. The State argues that the Court should dissolve the injunction because of a purported change in the law. But because Rule 1.1012 does not include changes in the law as a basis for modifying or vacating a final judgment, a change in the law also cannot be the basis for modification under the equitable exception recognized in *Shaw* and its progeny.

The existence of this equitable doctrine undercuts the State's arguments about the nature of equitable relief. Recognizing their broad equitable powers, Iowa courts have already set out a specific exception to Rules 1.1012–13. The line of cases applying the exception shows that the courts have carefully monitored the boundaries of this equitable exception to prevent it from swallowing the rule. In stark contrast, the State asks this Court not to apply this carefully cabined exception to the Rules, but rather to declare that it has broad authority to vacate or modify permanent injunctions, indifferent to what the Rules require. No Iowa court has followed this approach. This Court should decline the State's invitation to disregard the strictures of the Rules and should hold that Rules 1.1012–13 apply.

II. To the Extent the State Seeks Further Factual Development Under an Undue Burden Standard, Its Request Should Be Denied.

In the State's reply brief, it argues for the first time that if the Court does not apply rational basis scrutiny, it should apply what it calls an "adequate opportunity" version of the

[5] Courts have strictly applied *Shaw*'s limitations on equitable tolling of the one-year limit in Rule 1.1013. For example, in *In re Marriage of Valentine*, 758 N.W.2d 839, 2008 WL 3916452 (Iowa Ct. App. 2008), the court denied the petitioner's motion to modify a marriage dissolution decree, holding that she had not established that, had she exercised reasonable diligence, she could not have discovered her husband's fraudulently hidden pension within one year of the judgment. *Id.* at *4.

undue burden test. Reply Br. at 25–26. Under this purported "'adequate opportunity' version of the undue-burden test," the State argues that the Ban could pass constitutional muster because, according to its experts, embryonic or fetal cardiac activity is not detectable until seven or eight weeks of gestation. The State suggests that further factual development is necessary to determine whether the Ban is unconstitutional under this new test, arguing that the Ban could pass constitutional muster because, according to its experts, embryonic or fetal cardiac activity is not detectable until seven or eight weeks of gestation. Reply Br. at 25. These new arguments must be rejected on their merits.

The State draws from Chief Justice Roberts's opinion in *Dobbs* concurring in the judgment, in which he stated he would not overrule *Casey*, but he would uphold a pre-viability gestational age ban—in that case, a 15-week ban, *Dobbs*, 142 S. Ct. at 2315 (Roberts, C.J., concurring in the judgment). Not only did no other justice join this opinion, but no court has *ever* applied it. To the contrary, every federal court to apply the *Casey* undue burden standard to a pre-viability gestational age ban concluded that the ban violated that standard. *See* Opp. Br. at 14–15 (collecting cases). And the Iowa Supreme Court has also never endorsed, applied, or even discussed this version of the purported undue burden test, making it wholly inappropriate for this Court to dissolve the injunction to be the first court to pass on this question. Rather, as Plaintiffs have pointed out, the last word from the Iowa Supreme Court is that "the *Casey* undue burden test,"—not a modified undue burden test—"remains the governing standard." 975 N.W.2d at 716.[6]

[6] Further, the State ignores the reasoning of Chief Justice Roberts's concurrence. He states he would uphold the 15-week ban because by 15 weeks, a "pregnancy is well into the second trimester[,. . .] a woman ordinarily discovers she is pregnant by six weeks of gestation[, . . . and a]lmost all know by the end of the first trimester." 142 S. Ct. at 2315. Therefore, he would conclude that "a 15-week ban provides sufficient time, absent rare circumstances, for a woman to

Furthermore, this Court already addressed and resolved years ago the factual issues the State purports to raise. In the Statement of Facts accompanying their summary judgment motion, Plaintiffs submitted as an undisputed fact that embryonic or fetal cardiac activity is detectable as early as six weeks after the last menstrual period. Pet'rs' Statement of Undisputed Facts at 1.[7] The State tried to manufacture a genuine dispute of material fact by proffering expert testimony that using an abdominal ultrasound, cardiac activity is first detectable at seven or eight weeks of gestation. Br. in Resistance to Summ. Judg. at 5. This Court concluded there was no dispute of material fact because it was "undisputed that . . . cardiac activity is detectable well in advance of the fetus becoming viable." Ruling on Mot. for Summ. Judg. at 3. As a result, the Court held that the Ban was unconstitutional because it did not survive strict scrutiny, but also stated that its decision was "buttressed by" federal cases that ruled that previability gestational age bans and other six-week bans did not satisfy the *Casey* undue burden standard. *Id.* at 6–7. *PPH IV* left the *Casey* undue burden standard in place, so the factual analysis regarding the pre-viability ban also has not changed.

The State requests that if the Court reopens the case for factual development, it should dissolve the injunction. Similar to its request for permanent dissolution, this request is not based on any Iowa statute, rule, or judicial decision. It cites *Iowa State Dep't of Health v. Hertko*, 282 N.W.2d 744 (Iowa 1979), but that case involved the denial of a temporary injunction, not the dissolution of a permanent one. The Rules of Civil Procedure include no provision for vacating or modifying a judgment pre-emptively while a court reconsiders it, and the State fails to cite a

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decide for herself whether to terminate her pregnancy." *Id.* (internal quotation marks omitted). This reasoning does not apply to the six-week ban here.

[7] According to the affidavit of Jill Meadows, which was filed as an exhibit to Plaintiffs' Motion for Summary Judgment, at that very early stage of pregnancy, embryonic or fetal cardiac tones are detected by transvaginal ultrasound. Aff. of Jill Meadows in Support of Pet'rs' Mot. for Temp. Inj. Relief at ¶ 7 (also filed as an exhibit to Plaintiffs' motion for summary judgment).

single case suggesting such a procedure would be proper. Before the Rules were promulgated in 1943, Iowa Code § 12799 provided, "The party seeking to vacate or modify a judgment or order may have an injunction suspending proceedings on the whole or part thereof, which shall be granted by the court or a judge thereof upon its being rendered probable, by affidavit or verified petition, or by exhibition of the record, that the party is entitled to the relief asked." Iowa Code § 12799 (1939). Rules 252–56 (now renumbered as Rules 1.1012 *et seq.*) superseded Section 12799, which was part of Chapter 552, and include no such provision.

Even if the Rules permitted dissolution of the permanent injunction pending further fact finding, the State, as the moving party, would bear the burden of showing that dissolution is merited. *In re Marriage of Heneman*, 396 N.W.2d 797, 800 (Iowa Ct. App. 1986) (movant bears burden for motion under Rule 252 (now renumbered as 1.1012)). The State tries to shift that burden to Plaintiffs, essentially asking the Court to require Plaintiffs to re-establish the basis for a temporary injunction. But at this point, the Court has already entered a permanent injunction. The status quo is to maintain Iowans' right to safe and legal abortion—not to eviscerate it—especially given that Plaintiffs are likely to succeed on the merits under existing law. The Court should deny the State's alternative request for relief.

CONCLUSION

For the foregoing reasons, the State's Motion to Dissolve the Permanent Injunction should be denied in its entirety. Not only has the State failed to establish a jurisdictional or procedural basis for its motion, but even if it had, it cannot overcome the threshold inquiry of showing a change of the law that would alter the outcome of the case because the undue burden test remains the law under *PPH IV*. Further, to the extent that the State seeks dissolution of the injunction pending further factual development, the Court should deny its request because the

State has not met its burden to show that the existing legal protections for abortion after six weeks should be lifted.

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