

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

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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.

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Equity Case No. EQCE083074

**PETITIONERS' STATEMENT OF  
UNDISPUTED FACTS**

**COME NOW** Petitioners, Planned Parenthood of the Heartland, Inc. (“PPH”), the Emma Goldman Clinic (“EGC”), and Jill Meadows, M.D., and submit the following statement of undisputed facts pursuant to Iowa R. Civ. P. 1.981 in support of their motion for summary judgment.

UNDISPUTED FACTS

1. Petitioners provide abortions in Iowa. App. I to Mot. for Summ. J., Aff. of Jill Meadows, M.D., in Supp. of Pet’rs’ Mot. for Temporary Injunctive Relief (“Meadows Aff.”) at A002; App. I to Mot. for Summ. J., Aff. of Abbey Hardy-Fairbanks, M.D. at A017–018.
2. Embryonic or fetal cardiac activity is detectable as early as six weeks into a pregnancy, measured from the first day of the last menstrual period (lmp). Meadows Aff. at A003.
3. A six-week embryo is not viable (in the sense of being capable of sustained survival outside of the pregnant woman’s uterus). *Id.* at A002 (current 20-

week post-fertilization Iowa statutory limit “is a minimum of several weeks before any fetus would be viable”).

Respectfully submitted,

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**ATTORNEYS FOR PETITIONERS**

\*Admitted *pro hac vice*