

No. 23-1275

IN THE
Supreme Court of the United States

EUNICE MEDINA, INTERIM DIRECTOR,
SOUTH CAROLINA DEPARTMENT OF
HEALTH AND HUMAN SERVICES,

Petitioner,

v.

PLANNED PARENTHOOD SOUTH ATLANTIC, *et al.*,

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE FOURTH CIRCUIT

**BRIEF OF 138 WOMEN HURT BY PLANNED
PARENTHOOD ABORTIONS AND THE
NON-PROFIT ORGANIZATION “AND THEN
THERE WERE NONE” AS *AMICI CURIAE*
IN SUPPORT OF PETITIONER**

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INTEREST OF AMICI¹

***Amici* 138 Women Hurt by Planned Parenthood Abortions**

Amici 138 Women Hurt by Planned Parenthood Abortions² are women who were injured by abortions performed by Planned Parenthood Affiliates.³ Most of the *Amici* Women Hurt by Planned Parenthood Abortions suffered grievous psychological injuries, but many suffered severe physical complications, as well. All were exposed to the risk of serious and permanent physical injury, as well as serious psychological injuries,⁴

1. No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief. No person other than *Amici Curiae*, their members, or their counsel made a monetary contribution to its preparation or submission.

2. Attached as Appendix A is the list of the initials or first names of the *Amici Curiae* Women. In order to protect their identities, some of the women have requested that we use initials only or first name only. These women's sworn affidavits or declarations made under penalty of perjury are on file at The Justice Foundation. Protecting the identity of women who have had abortions or seek abortions has been customary since *Roe v. Wade*, 410 U.S. 113 (1973) and *Doe v. Bolton*, 410 U.S. 179 (1973) where *Roe* and *Doe* both were pseudonyms.

3. *Amici* offer, as additional interest of Amici, their affidavits and declarations as women hurt by Planned Parenthood abortions. Link to Full Declarations: <https://www.dropbox.com/scl/fo/ee0euyno0nc94rw42zvv3/ACCjN40b4EkVxvsb3f2OL-c?rlkey=2i2liwzo4unfn5is5t8houhsb&dl=0>

4. See, e.g. "Women who had undergone an abortion experienced an 81% increased risk of mental health problems, and nearly 10% of the incidence of mental health problems was shown to

and thus have a profound interest in protecting other women in South Carolina, and across America, from such injuries. Their states of residence also have an interest and a duty to protect them and others from the dangerous practices of Planned Parenthood.

Amici Women have experienced first-hand—some multiple times—the callous and predatory reality of the abortion industry, including through Planned Parenthood, in certain particular cases. They argue the vast majority of women who go to high-volume abortion facilities are treated as a commodity, not as a patient. The word “patient” will not be used in this Brief because *Amici* Women had no real doctor-patient relationship with their abortion facilities; only the legal fiction necessary to bill Medicaid. (See testimonies in Footnote 3.)

With increased use of abortion pills and telemedicine, this legal fiction of a “relationship” is even more attenuated and transactional. Certainly, with respect to *Amici* Women, there was no real doctor-patient relationship which is supposed to create “successful communication” which “fosters trust and supports shared decision making.”⁵ See Footnote 3, *supra*. With abortion pills, the procedure now becomes a mail order process.

be attributable to abortion.” See Coleman, Priscilla, “Abortion and Mental Health: Quantitative Synthesis and Analysis of Research Published 1995-2009,” *The British Journal of Psychiatry* (2011) 199, 180-186, DOI: 10.1192/bjp.bp.110.07723. (A meta-analysis of 22 studies.)

5. American Medical Association, Council on Ethical and Judicial Affairs, Opinion 2.1.1 Informed Consent <https://www.ama-assn.org/delivering-care/ethics/informed-consent>

***Amicus* “And Then There Were None”**

Amicus “And Then There Were None” (ATTWN) is a nonprofit organization that assists abortion workers in their exit strategy from the abortion industry. Founded by Abby Johnson in 2012, after her exit from Planned Parenthood, ATTWN has helped over 700 former abortion industry workers and whistleblowers with a network of resources and counseling services.

Many of these former abortion workers have witnessed horrific abuse of patients, staff, unborn babies, and fetal remains, resulting in PTSD symptoms and moral injury. Their firsthand accounts of these abuses are not isolated to a limited number of facilities but have been found in multiple locations and different organizations, throughout the abortion industry.

The abortion industry has made a business of the death and removal of human beings by labeling them “products of conception”, “tissue”, “clumps of cells”, instead of babies, thereby disguising their humanity.⁶ This sleight of hand furthers the ends—a profitable and economic enterprise—and their clients carry the brunt of the physical, emotional and moral costs. They misrepresent the status of the “infant life” that is terminated in every abortion per *Gonzalez v. Carhart*, 550 U.S. 124, at 159 (2007) by telling women their child is just a blob of tissue. See, e.g. Testimony of Joetta, section II.A, *infra*.

6. The Eighth Circuit Court of Appeals has upheld the scientific fact that abortion is the termination of the life of a separate, living, unique human being.” *Planned Parenthood v. Rounds*, 530 F 3rd 724, 737-738 (8th Circuit 2008) (*en banc*).

These brave whistleblowers attest to the abuse of women by the abortion industry, including Planned Parenthood, at great personal risk and cost. Because of this, the workers will be referred to by first name, only, and personally identifying information has been removed or redacted.⁷

SUMMARY OF ARGUMENT

Roe v. Wade has been overturned. There is no Constitutional right to abortion. This Court held in *Dobbs* that “the authority to regulate abortion must be returned to the people and their elected representatives.” *Dobbs v. Jackson Women’s Health Org.*, 597 U.S. 215, 292 (2022).

South Carolina’s elected governor decided to protect women from abortion by reasonably deciding to exclude abortion providers who harm women and children from Medicaid. The governor made the policy determination that—because money is fungible—state funds which flow into abortion providers allow those providers to pay administrative and operational costs that indirectly support abortion services.

For 49 years, the *Roe v. Wade* framework “led to the distortion of many important but unrelated legal doctrines.” *Dobbs v. Jackson Women’s Health Org.*, 597 U.S. 215, 286. This lawsuit, brought by Planned Parenthood and its proxy, is an attempt to overturn the decision of the elected Governor of South Carolina with

7. Names and identifying information of former workers who provided personal testimonies for this brief are on file with The Justice Foundation and are protected by attorney-client privilege.

a *Roe*-polluted argument for Federal Court intervention in a State’s democratic process.

ARGUMENT

I. Planned Parenthood wants Federal Courts to award it State Medicaid funds, short-circuiting the democratic process in South Carolina

This Court in *Dobbs* held that the Constitution does not provide a right to abortion, when the Court “returned that authority to the people and their elected representatives.” *Dobbs v. Jackson Women’s Health Org.*, 597 U.S. 215, 302 (2022).

The people of South Carolina, by and through their elected governor, sought to exercise authority over abortion by depriving abortion providers of fungible state monies that abortion providers could use to subsidize their abortion activities. *See* Exec. Order No 2017-15, 41-9 S.C. State Reg. 7, (Sept. 22, 2017) (“ . . . abortion providers may be subsidized by State or local funds intended for other women’s health or family planning services, whether such non-abortion services are rendered directly by abortion providers or by affiliated physicians or professional medical practices.”).

Amici Women directly experienced the misrepresentations and substandard health practices of the abortion industry. *Amici* Women hereby support South Carolina and all states in their right and duty to protect women from abortion industry abuse. *Amici* Women provide this Court with their credible perspectives as women who have experienced the pain, trauma, and

deception associated with their abortions, all of which were performed by Planned Parenthood affiliates.

Planned Parenthood’s argument thus requires Federal Courts to abrogate authority which was rightfully wielded by the people of South Carolina. The game of appellate ping-pong being played in this case appears to *Amici* to be an attempt to delay the inevitable vindication of State authority without any legally-valid argument favoring abortion providers. Only with a clearly articulated expression of authority by Congress and an express agreement by the state, under the Spending Clause, can that state authority be abrogated. *Amici* agree with South Carolina that Congress left this particular question to the States.

A. Planned Parenthood provides no credible rationale for Federal Courts to shoehorn abortion providers into every State Medicaid program in the country

Planned Parenthood’s argument has no limiting principle and is not supported by the statutory text.⁸

Planned Parenthood’s argument rests on the unsupported assertion that abortion providers, as a class, are intended third-party beneficiaries of Federal-State

8. “A statute that speaks to the government official who will regulate the recipient of federal funding ‘does not confer the sort of individual entitlement that is enforceable under § 1983.’” *Does v. Gillespie*, 867 F.3d 1034, 1041 (8th Cir. 2017) (citing *Gonzaga Univ. v. Doe*, 536 U.S. 273, 287 (2002) (cleaned up)). *But see, e.g., Planned Parenthood of Kan. & Mid-Mo. v. Andersen*, 882 F.3d 1205, 1224 (10th Cir. 2018).

Medicaid contracts *for services unrelated to abortion*. By this same logic, *any* business which provides *any* Medical service authorized by Medicaid would be an intended beneficiary of Medicaid and have a cause of action under § 1983. If excluded as a class, plastic surgeons specializing in liposuction would have a right to sue to be qualified, because plastic surgery is sometimes covered under Medicaid although liposuction is not. Dentists could sue to be qualified, because oral surgery is sometimes covered under Medicaid although general dentistry is not. The list is boundless and Planned Parenthood's argument would demand that Courts entertain § 1983 suits for all of them.

In reality, Planned Parenthood expects Courts to treat abortion differently because it was treated differently for almost 50 years. Planned Parenthood understandably wants to delay implementation of *Dobbs* by lower courts. *Dobbs* is the law of the land. Planned Parenthood's desired remedy is extraordinary, undermines an independent judiciary, and would never be granted to another industry.

Having lost the electoral battle in South Carolina, Planned Parenthood pivoted to polarize the public's view of the judiciary by demanding that pro-abortion judges endorse its efforts to appropriate State funds. This effort led to distorted jurisprudence which carves out exceptions to the rule of law in favor of the abortion industry.

The Fourth Circuit seemingly refused to acknowledge that the Supreme Court had vacated its prior decision in this case, stating "South Carolina insists that we ought to abandon our prior position in light of the Supreme Court's recent opinion in *Health and Hospital Corp. of Marion County v. Talevski*, 599 U.S. 166, 143 S. Ct. 1444,

216 L. Ed. 2d 183 (2023).” Pet. App. 4a. But it was *this Court*—not South Carolina—that required the Fourth Circuit to re-examine this case. Pet. App. 37a. The result is that the lawful directive of South Carolina’s governor⁹ has remained enjoined for another year while South Carolina’s duly-enacted regulation remains enjoined.

This Court has the obligation to overrule inferior Courts which ignore its directives.

II. *Amici* experiences demonstrate that the abortion industry regularly perpetrates harm on women, a violation of responsibilities of Medicaid providers

These *Amici* submit their testimonies of pain and trauma inflicted by the abortion industry, not as a polemic, but as a warning to courts and the public.

A. As *Amici* Women Hurt by Abortion attest, abortion providers have demonstrated that their loyalty is to abortion, at the expense of their clients (See Footnote 3)

From Testimony of Joetta, a Planned Parenthood Client

I actually wanted to leave and said I can’t do this [r]ight before the doctor started the abortion,

9. *Amici* agree in full with the substantive arguments advanced by the petitioner, Medina, in this case. The Medicaid statute does not dictate that any business or class of business must be qualified by the State as a provider, and that determination has been left to states by the two Circuits following the statute. *See generally Does v. Gillespie*, 867 F.3d 1034 (8th Cir. 2017); *Planned Parenthood of Greater Tex. Fam. Plan. & Preventative Health Servs., Inc v. Smith*, 913 F.3d 551 (5th Cir. 2019).

but they just pushed me back and told me to calm down and they started the procedure with me crying and saying I wanted to leave.

From Testimony of Donna, a Planned Parenthood Client

Planned Parenthood sedated Donna before her sonogram, inhibiting her ability to give free consent to the procedure.

They gave me valium and did a sonogram to show where the fetus was and discovered that I was pregnant with twins. My heart sank, and I asked if it was too late to change my mind. I thought the valium did damage to the fetus. The response I got was something to the effect that I wouldn't be able to care for two babies, if I couldn't care for one.

From Testimony of Virginia, a Planned Parenthood Client

They told me it was okay, it was just removing tissue, everyone does it and it doesn't even hurt. I was never given an ultrasound and I was calculated to be 12 weeks along, but the doctors found out during the abortion that I was actually 20 weeks along and I almost died along with my baby the day I had my abortion.

From Testimony of Laurie, a Planned Parenthood Client

After the abortion, I was brought into a sort of resting room to recover. Minutes later, I was told that they had to bring me back in because they hadn't gotten "all of it".

In the months following, I had quite a bit of cramping—more than the usual—but was still afraid to tell anyone or to see a doctor. Unbeknown[st] to me, my fallopian tubes were scarr[ed] and then they sealed themselves closed. 15 years later my husband and I tried to conceive. We tried for several years and then I sought infertility treatments. Little did I know my fallopian tubes were closed. I had three operations to open them, but each surgery failed. I was unable to conceive a child because of the scarring that had [occurred] from the abortion!

From Testimony of Mary, a Planned Parenthood Client

I remember beginning to cry out in pain and I was held down forcefully told to shut up. It was cruel and ugly!!! I then was put in a room with multiple other women who sat around on chairs. We all had the look of death on our faces. No one spoke. We just tried not to look at each other. I remember being in horrible pain and was told I could go. All I did that night was cry. The whole experience was degrading and cruel.

One of the essential functions that a “qualified medical provider” should provide is obtaining voluntary informed consent. When women ask Planned Parenthood “Is it a baby?”, Planned Parenthood responds that it is just removing tissue.¹⁰ Planned Parenthood ignores the decision of the Eighth Circuit Court of Appeals which evaluated the scientific evidence on the issue and upheld a South Dakota law requiring abortionists to tell women the fundamental truth which they should tell women on their own. South Dakota had to force Planned Parenthood by statute to tell women the following factual definition of abortion: “Abortion is the termination of the life of a separate, living, unique human being.”¹¹ Human being was defined as a “member of the species *Homo Sapiens*.” *Planned Parenthood v. Rounds*, 530 F 3rd 724 (8th Circuit 2008) (*en banc*). The Court held this statement was scientifically supported, factual, not misleading, and relevant to women’s decisions.

These testimonies are not news to Planned Parenthood or other abortion providers. They have heard the women’s screams. The harm inflicted on women by abortion is extensive and ongoing. Providing the means for a mother to initiate the death of her own child—while downplaying the nature and consequences of that decision—impugns the ethics and decency of participating organizations and their leadership. Whether providers of abortions have the right to be qualified providers under South Carolina Medicaid is an issue for that state’s administrative appeals process. Planned Parenthood allowed its administrative

10. See, e.g., Testimony of Virginia, *supra*.

11. *Planned Parenthood v. Rounds*, 530 F 3rd 724 (8th Cir. 2008) (*en banc*).

appeal, the remedial scheme created by the statute, to lapse. Pet. 9. And the governor's decision lifts and supports the voices of all women injured by abortion, including *Amici*.

B. *Amici* “And Then There Were None” (an organization to support former employees of Planned Parenthood and of the Abortion Industry) corroborate the experience of *Amici* Women Hurt by Planned Parenthood Abortions, and give an inside look at the abortion industry’s self-interested agenda

The following testimonies shed light on Planned Parenthood business practices and include instances of deviation from ethical and legal obligations, which support South Carolina’s action.

From Testimony of Eva, former Planned Parenthood clinical staffer

Eva recalls a woman bringing her aborted baby into the Planned Parenthood clinic, accusing them of lying to her.

I remember one woman in particular. She said that she was angry that the person who did the consultation at the clinic made her kill her baby. She actually brought the baby that she passed back to the clinic in a paper bag. The Nurse Practitioner told me to tell the woman to dump it. I was really tempted to see for myself what was in the bag but I told the Nurse Practitioner to tell the patient herself. She did and she eventually convinced the woman to dump it.

From Testimony of Mayra, former Planned Parenthood Clinic Manager

Medicaid only pays for abortion in cases of rape and incest, due to the Federal Hyde Amendment. Clinic Manager Mayra alleges that Planned Parenthood uses this exception inappropriately:

I recall this instance where Planned Parenthood told the mother of a minor, about 14 years old, pregnant by a 17-year-old, how Medicaid could pay for the abortion by claiming the pregnancy was a result of rape. The mother knew that her daughter had not been raped and didn't want to ruin the boy's life just to pay for the abortion.

Medicaid pays for abortions in circumstances for incest and rape for undocumented people through [our State Medicaid] program. That required a lot of paperwork at the time, but it was a way for us to get paid to perform more abortions.

Mayra's experience also demonstrates the double-billing by Planned Parenthood as, when a surgical follow-up was necessary, after a chemical pill abortion, Planned Parenthood billed twice—once for their chemical and once for the surgical abortion.

[Planned Parenthood] charged her insurance for the follow-up surgical procedure after already getting payment for the abortion pill.

Planned Parenthood knows it's double dipping. They know **42% of patients who take abortion pills (emphasis added)** will require a follow-up that either includes another set of pills or includes an aspiration for which they will charge again.

**From Testimony of L., former Planned Parenthood Clinical Office Staffer—
Inadequate Staff Training**

L. was told to train other staff on administering nitrous oxide to patients, although she was not certified herself. Administering nitrous oxide requires several hours of formal and clinical training under her state's laws.

Without any formal medical education, I was asked to train clinic staff to administer Nitrous Oxide to patients. I refused and said I wasn't comfortable with doing this. It isn't unusual for the clinic to train people in roles they weren't credentialed for. Employees often performed roles they were not properly trained to do.

From inside the abortion clinics, the view is clearly more cynical and abortion-focused than their clients could ever know. As *Amici* attest, pregnant women in difficult situations are among the most vulnerable people in society, and the abortion industry readily exploits that vulnerability to achieve its aim—more abortions. Every dollar of South Carolina taxpayer money that is withheld from the abortion industry benefits women by funding real qualified providers who will provide patient-focused

medical care. This Court should allow the elected governor of South Carolina to execute his validly issued executive order.

These experiences demonstrate that abortion providers have a destructive tendency to push their misleading and deadly solution on every pregnant woman, regardless of her desire to get an abortion—or not. Any state would be completely justified in excluding abortion providers from receiving any State funds based on these legal, moral and ethical concerns. South Carolina cannot be penalized by federal courts for reaching that conclusion.

CONCLUSION

The Medicaid Act's any qualified provider provision does not confer an ambiguous right of action to a Medicaid beneficiary to choose a specific provider. To find otherwise continues the fallacy that Planned Parenthood serves abortion clients as patients, when they do not. *Amici* ask this Court to reject Planned Parenthood's attempt to weaponize Federal Courts by collaterally attacking valid State laws and regulations protecting women—like *Amici* Women Hurt by Abortion—from abortion providers.

Respectfully submitted,

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**APPENDIX — NAMES OF *AMICI CURIAE*
138 WOMEN HURT BY PLANNED
PARENTHOOD ABORTIONS**

**Names of *Amici Curiae* 138 Women Hurt by Planned
Parenthood Abortions**

Serena, Samantha, Donna, L.R., Shauna, Linda, Millie, Christina, Minda, Linette, Gina, Mary Anne, Bianca, B.J.H., R.M., Mary, Racheal, S.N., Taylor, Christine, Sheri, K.S., Sandy, Sonia, Kori, Catherine, V.M., C.K., Lorraine, Jeanne, Rachele, Judy, G.E., B.R., Regina, Paula, A.K., Michelle, Mary, Susan, Rachel, Ronda, R.H., Joan, Carol, E.J., B.J., Hilary, Jessica, Emily, Linda, M.P., Jennifer, Elaine, Michelle, Stephanie, R.B., Louise, Lisa, R.C., Katie, Mary Jean, Carrie E., Carrie, P., C.S., Donna, Virginia, Narda, Lianne, Linda, Cathy, Barbara, Ronda, Stacy, Virginia, Therese, S.K., Karen, Laura, Gwendolyn, D.P., Laurie, Jacqueline, Laura, Karen, K.R., Denise, Judi, K.F., Dianna, Beverly, Tara, Teresa, Joanne, Cindy, Michelle, Georgianne, K.E., Shirley, Theresa, Patricia, Joetta, Marla, Kathleen, Krista, Sherin, Gail, D.G., Nancy, Janice, Debbie, Patricia, Elizabeth, Lisa, Jane, Lynn, Laura, Nona, Amanda, Ashton, Randa, Susan, L.W., Mary, Mary C., Jessica, T.P., Julie, Adrienne, Karen, Teresa, C.S., L.H.G., Cheryl, Brenda, Lani