CAUSE NO. D-1-GN-23-008611

KATE COX; JUSTIN COX; AND DAMLA	§	IN THE DISTRICT COURT OF
KARSAN, M.D.; on behalf of herself, her	§	
staff, nurses, pharmacists, agents, and	§	
patients,	§	
Plaintiffs,	§	TRAVIS COUNTY, TEXAS
•	§	
v.	§	
	§	
STATE OF TEXAS, et al.,	§ _	200th JUDICIAL DISTRICT
Defendants.	§	

DECLARATION OF INGRID SKOP, M.D.

I, Ingrid Skop, M.D., hereby declare as follows:

- 1. I am over the age of eighteen and am competent to offer testimony. I submit this expert declaration based on my personal knowledge and experience.
- 2. I have been a board-certified obstetrician and gynecologist (OB-GYN) since 1998. I received my undergraduate degree from Oklahoma State University and my medical degree from Washington University School of Medicine. I completed my residency in obstetrics and gynecology at the University of Texas Health Science Center at San Antonio.
- I practiced obstetrics and gynecology at a private practice in San Antonio from
 1996 to 2022. I continue to practice as an obstetric hospitalist today.
 - 4. I've attached a copy of my C.V. detailing my experience, training, and knowledge.
- 5. I am familiar with Texas' abortion laws and previously provided expert testimony on the medical exception in *Zurawski v. St. of Tex.*, Cause No. D-1-GN-23-000968 (Travis Ct'y Dist. Ct. 353rd Jud. Dist., March 6, 2023).

- 6. A medical exception exists to Texas' general prohibition on abortion when a physician, in their reasonable medical judgment, concludes that a pregnant female "has a lifethreatening physical condition aggravated by, caused by, or arising from a pregnancy that places the female at risk of death or poses a serious risk of substantial impairment of a major bodily function unless the abortion is performed or induced." Tex. Health & Safety Code § 170A.002(b)(2).
 - 7. I have reviewed the pleadings in this matter.
 - 8. Ms. Cox alleges that her child has been diagnosed with trisomy-18.
- 9. Ms. Cox alleges that she has intermittently experienced the following symptoms during her pregnancy: elevated glucose levels, cramping, diarrhea, and leakage from an unknown source.
- 10. Ms. Cox also alleges that she is at increased risk of complications during birth due to her two prior C-section births.
- 11. In my expert opinion, as pled, Ms. Cox has *not* alleged that she has been diagnosed with a life-threatening physical condition aggravated by, caused by, or arising from her pregnancy as required to qualify for the medical exception.
- 12. Further, in my expert opinion, as pled, Ms. Cox has *not* alleged that she has been diagnosed with a condition that places her at risk of death or poses a serious risk of substantial impairment of a major bodily function unless the abortion is performed or induced as required to qualify for the medical exception.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in $\underline{\textit{Bexar}}$ County, TX, on December 7, 2023.

Ingrid Skop, M.D.

SWORN TO AND SUBSCRIBED before me on December 7, 2023.

Notary Public, State of Texas

