CAUSE NO. _____

MARIA PUERTO,

Relator,

v.

KRISTAN MERCER HAWKINS; LYDIA TAYLOR DAVIS; JAMIE CURRY; and MEGAN ROOS,

Defendants.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

_____ JUDICIAL DISTRICT

RELATOR'S ORIGINAL PETITION

Because abortion is illegal in Texas, Maria Puerto[1] became a parent long before she was ready. During her first pregnancy in 2022, Ms. Puerto lost her job and her college scholarship. In 2024 she was forced to carry a second pregnancy to term. Texas law provides no obvious recourse for Ms. Puerto to seek financial support from the state. Texas law apparently does, however, allow *anyone*, including Ms. Puerto, to seek *at least* $100,000 from anyone who "mail[s], transport[s], deliver[s], prescribe[s], or provide[s] an abortion-inducing drug in any manner to or from any person or location in this state" or "intends" to do so. In March 2026, Kristan Mercer Hawkins, Lydia Taylor Davis, Jamie Curry, Megan Roos, and other unknown individuals associated with Students for Life of America, a well-known anti-abortion organization, openly and flagrantly violated this law, the so-called "Woman and Child Protection Act," also known as House Bill 7. With nowhere else to turn for assistance, Ms. Puerto is seeking financial compensation from Ms. Hawkins, Ms. Davis, Ms. Curry, Ms. Roos, and Students for Life under H.B. 7 in the amount of $459,782—the average cost of raising two children from birth to age 18 in the state of Texas.[2]

[1] For the reasons discussed in Relator's Motion for A Protective Order, Maria Puerto is a pseudonym.

[2] Matt Schulz, *It Costs an Additional $303,418 to Raise a Child Over 18 Years, Up 1.9%*, LENDINGTREE (Apr. 6, 2026), https://www.lendingtree.com/debt-consolidation/raising-a-child-study.

In support of her petition, Ms. Puerto respectfully alleges and shows the following:

FACTUAL ALLEGATIONS

A. Persons Associated with Students for Life of America Ordered Abortion Pills in Texas

1. On March 23, 2026, Kristan Mercer Hawkins added a picture to her Instagram "story"—a temporary social media post that disappears after 24 hours—that shows her, Lydia Taylor Davis, and Jamie Curry standing in front of Space Center Houston. Text layered atop the photograph in the post reads: "Guess what we are doing? Ordering abortion pills undercover? Yep. Stay tuned." A screenshot of the post is reproduced below.

2. Space Center Houston is an easily recognizable landmark in Houston, Texas that can be seen in the photograph. The word "Houston" is even visible on the side of the building in the photograph.

3. "Abortion pills" is a phrase sometimes used to describe the medications mifepristone and/or misoprostol when taken by a pregnant person to terminate a pregnancy—also known as "abortion-inducing drugs" or "medication abortion."[3]

4. Students for Life of America (or "Students for Life") is a 501(c)(3) non-profit organization located in Fredericksburg, Virginia that "exists to recruit, train, and mobilize the pro-life generation to abolish abortion." Since it was launched by Ms. Hawkins in 2006, Students for Life has founded Students for Life groups on high school, college, and graduate campuses across the country but according to their website, "starting Students for Life groups is not our mission. Abolishing abortion is."[4] Students for Life also has a lobbying arm.

5. Students for Life represents an extreme yet influential fringe of the anti-abortion movement. For example, Ms. Hawkins and Students for Life have played a central role in pushing the widely debunked claim that "the chemical abortion drug mifepristone [is] actually in our drinking water," dedicating significant efforts to lobbying the federal government to "study" this myth, and even threatening litigation for failure to do so.[5] In addition, Students for Life opposes

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[3] *See, e.g.*, *Mifeprex (mifepristone) Label*, FDA (last updated Mar. 23, 2023), https://www.accessdata.fda.gov/drugsatfda_docs/label/2023/020687Orig1s026lbl.pdf; *Cytotec (misoprostol) Label*, FDA (last updated Feb. 28, 2018), https://www.accessdata.fda.gov/drugsatfda_docs/label/2018/019268s051lbl.pdf.

[4] *Who We Are*, STUDENTS FOR LIFE OF AMERICA (last visited Oct. 6, 2026), https://studentsforlife.org/about/who-we-are.

[5] Kate Quiñones, *House Bill Targets Environmental Impact of Chemical Abortion and Doctors' Role in the Process*, ETWN NEWS (Mar. 18, 2026), https://www.ewtnnews.com/world/us/house-bill-targets-environmental-impact-of-chemical-abortion-and-doctors-role-in-the-process (noting Students for Life's role in such efforts while stating that "the Food and Drug Administration did an environmental assessment of mifepristone tablets and found 'no significant impact.'''); Nathaniel Weixel, *Anti-abortion group threatens to sue FDA over mifepristone*, THE HILL (Sept. 24, 2026), https://thehill.com/policy/healthcare/6109450-anti-abortion-group-sues-fda/ (commenting that Students for Life had filed a notice of intent to sue the Food and Drug Administration, noting that "[e]nvironmental scientists dispute" Students for Life's claims). *See also, e.g.*, Candace Gibson & Anna Bernstein, *Weaponizing Water: How the*

exceptions to abortion bans for rape and incest, and has argued that "[a]bortions are NEVER medically necessary."[6] Further, Ms. Hawkins, on behalf of Students for Life's lobbying arm, publicly supported a South Carolina bill that would put women who seek abortion in prison.[7]

6. Ms. Hawkins is the President, C.E.O., and founder of Students for Life. Through her association with Students for Life, she presents herself to the public as categorically opposed to abortion at any time or for any reason.[8]

7. Ms. Davis is a spokesperson and the social media coordinator for Students for Life. Through her association with Students for Life, she presents herself to the public as categorically opposed to abortion at any time or for any reason.[9]

8. Ms. Curry is the campus tour and speaker bureau manager of Students for Life. Through her association with Students for Life, she presents herself to the public as categorically opposed to abortion at any time or for any reason.[10]

Campaign Against Medication Abortion Co-opts Environmental Policy, GUTTMACHER INSTITUTE (last updated Sept. 9, 2026), https://www.guttmacher.org/2025/12/weaponizing-water-how-campaign-against-medication-abortion-co-opts-environmental-policy (stating that there is "no scientifically valid basis for environmental or regulatory actions against mifepristone."); *Medications and Environmental Law*, CENTER FOR BIOLOGICAL DIVERSITY (last visited Oct. 6, 2026), https://www.biologicaldiversity.org/programs/population_and_sustainability/population/medications_and_environmental_law.html ("There's no evidence that medication abortion is affecting U.S. water systems, including drinking water and aquatic wildlife.").

[6] Caroline Wharton, *It's Official: We're So Done with Rape and Incest Exceptions*, STUDENTS FOR LIFE OF AMERICA (Apr. 11, 2022), https://studentsforlife.org/2022/04/11/its-official-were-so-done-with-rape-and-incest-exceptions/; Caroline Wharton, *Today on Explicitly Pro-Life: Abortions Are NEVER Medically Necessary*, STUDENTS FOR LIFE OF AMERICA (May 25, 2022), https://studentsforlife.org/2022/05/25/today-on-explicitly-pro-life-abortions-are-never-medically-necessary/.

[7] SFLA Action Staff, *End Abortion in South Carolina NOW: Students for Life Action Urges Senate to Stop Stalling on the 'Unborn Child Protection Act,'*, STUDENTS FOR LIFE ACTION (Apr. 13, 2026), https://www.studentsforlifeaction.org/end-abortion-in-south-carolina-now-students-for-life-action-urges-senate-to-stop-stalling-on-the-unborn-child-protection-act/?utm_source=substack&utm_medium=email.

[8] *Kristan Hawkins*, STUDENTS FOR LIFE OF AMERICA, https://studentsforlife.org/people/kristan-hawkins (last visited Oct. 6, 2026).

[9] *Lydia Taylor Davis*, STUDENTS FOR LIFE OF AMERICA, https://studentsforlife.org/people/lydia-taylor-davis (last visited Oct. 6, 2026).

[10] *Jamie Curry*, STUDENTS FOR LIFE OF AMERICA, https://studentsforlife.org/people/jamie-scherdin (last visited Oct. 6, 2026).

9. Ms. Roos is the Texas regional coordinator (for Texas and Oklahoma) of Students for Life. Through her association with Students for Life, she presents herself to the public as categorically opposed to abortion at any time or for any reason.[11]

10. Ms. Roos was knocking on doors in support of Representative Brisco Cain, District 128, in Houston on March 23, 2026 with Ms. Hawkins, Ms. Davis, and Ms. Curry, and others affiliated with Students for Life. Multiple Instagram posts from that day, including those reproduced below, show Ms. Roos with the Defendants, wearing the same outfits as in Ms. Hawkins's Instagram story. The caption to one post reads, in part: "1,700+ doors knocked…and maybe even a little media surprise," followed by the shy, laughing emoji. Upon information and belief, Ms. Roos was involved in ordering the abortion pills that day and may be the individual who took the photograph above for Ms. Hawkins's Instagram story.

[12]

[11] *Megan Roos*, STUDENTS FOR LIFE OF AMERICA, https://studentsforlife.org/people/megan-roos (last visited Oct. 6, 2026).

[12] Megan Roos (@texas_sfla), INSTAGRAM (Mar. 23, 2026), https://www.instagram.com/p/DWQFffKjHYh/?vrfl=MWhod3ptbGxmeXl4dQ%3D%3D.

[13]

11. Ms. Hawkins's Instagram story, through its photograph and text, clearly shows that Defendants were in Houston, Texas on March 23, 2026 when they either ordered or intended to order abortion pills to Texas, apparently over the internet using the smartphone in Ms. Davis's hands.

12. Recent reporting from journalist Amy Littlefield regarding the incident confirms that Defendants were in Texas on the day in question and that they ordered abortion pills, apparently multiple times. In video footage posted to YouTube, for example, Ms. Hawkins can be seen standing in front of Space Center Houston displaying an order confirmation.[14]

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[13] Jason Erwin (@prolife_pennsylvanian), INSTAGRAM (Apr. 2, 2026), https://www.instagram.com/p/DWpHoV5FURi/?img_index=2&xtok=MTI0dGNwZmhjMGFpcw%3D%3D.

[14] MOTHER JONES, *She's the "Charlie Kirk of Abortion." Her Post-*Roe *Work is Complicated*, at 18:37 (YouTube, Sept. 28, 2026), https://www.youtube.com/watch?v=jk0ua1HFNmk&t=729s; Amy Littlefield, *Kristan Hawkins*

13. Upon information and belief, Ms. Hawkins, Ms. Davis, Ms. Curry, and Ms. Roos are not pregnant and were not pregnant on March 23, 2026. It is thus unclear what Defendants did with the abortion pills and/or if they engaged in fraudulent misrepresentation(s) to obtain the abortion pills. According to Ms. Littlefield's reporting, Ms. Hawkins used the name "Wanda" in at least one of the orders for abortion pills, while Ms. Davis posed as a "minor."

14. The identity of the additional person who took the photograph, and anyone else involved in ordering abortion pills on March 23, 2026, is unknown.

15. Given Defendants' and Students for Life's categorical opposition to abortion and Ms. Littlefield's reporting, the Instagram post and associated events appear to be nothing more than a publicity stunt. Their behavior stokes fear among the physicians providing telemedicine abortion services to Texans, and in Relator Maria Puerto's words, "mocks" Texans like her.

Helped Kill Roe*. Now She's Fighting to Control the Movement She Created*, MOTHER JONES (Nov.-Dec. 2026), https://www.motherjones.com/politics/2026/09/kristan-hawkins-roe-anti-abortion-charlie-kirk.

Nonetheless, as discussed below, their stunt appears to violate the plain language of Texas House Bill 7 ("H.B. 7").

16. With this stunt, Defendants and Students for Life ignore the immense harms and multiple deaths already attributed to Texas's cruel abortion bans, and demean the six million Texans of reproductive age who have had their ability to decide whether and when to begin or expand a family stripped away by these bans. As discussed below, Relator Maria Puerto is just one of the many Texans who have suffered under Texas's abortion bans.

B. Texas House Bill 7

17. H.B. 7, titled the "Woman and Child Protection Act," was passed by the Texas legislature in 2025 and went into effect on December 4, 2025.

18. H.B. 7 states that "a person may not . . . mail, transport, deliver, prescribe, or provide an abortion-inducing drug in any matter to or from any person or location in this state." H.B. 7, codified at Tex. Health & Safety Code § 171A.051(a). A person who "violates" or "intends to violate" H.B. 7 is potentially liable under its provisions. H.B. 7, codified at Tex. Health & Safety Code § 171A.101.

19. "Abortion-inducing drug," as used in H.B. 7, is defined under Texas law as "a drug, a medicine, or any other substance, including a regimen of two or more drugs, medicines, or substances, prescribed, dispensed, or administered with the intent of terminating a clinically diagnosable pregnancy of a woman and with knowledge that the termination will, with reasonable likelihood, cause the death of the woman's unborn child. The term includes off-label use of drugs, medicines, or other substances known to have abortion-inducing properties that are prescribed, dispensed, or administered with the intent of causing an abortion, including the Mifeprex regimen,

misoprostol (Cytotec), and methotrexate." H.B. 7, codified at Tex. Health & Safety Code § 171A.001(2); Tex. Health & Safety Code § 171.061(2).

20. H.B. 7 provides an unusual mechanism for its enforcement that it describes as "*qui tam*." According to the law, "A person, other than this state, a political subdivision of this state, or an officer or employee of this state or a political subdivision of this state, has standing to bring and may bring a *qui tam* action against a person who" either "violates" or "intends to violate" its provisions. H.B. 7, codified at Tex. Health & Safety Code § 171A.101(1)-(2). This mechanism is unusual both because "intent" is generally insufficient to establish injury under civil law and because H.B. 7 is not a genuine *qui tam* statute, as the state suffers no damages when an individual in Texas orders abortion pills.[15] Nonetheless, H.B. 7's language is plain.

21. H.B. 7, in fact, explicitly prohibits the state from having any involvement in a suit brought under its provisions. "An action brought under this section must be brought in the name of the *qui tam* relator, who is an assignee of this state's claim for relief. Notwithstanding any other law, the transfer of this state's claim to the *qui tam* relator is absolute, with the state retaining no interest in the subject matter of the claim." H.B. 7, codified at Tex. Health & Safety Code § 171A.101(b).

22. An H.B. 7 action may not be brought "against a woman for using, obtaining, or seeking to obtain abortion-inducing drugs to abort or attempt to abort her unborn child." H.B. 7, codified at Tex. Health & Safety Code § 171A.101(d)(1).

23. H.B. 7 allows any "person" to bring a civil suit. The remedies available to a person who brings an H.B. 7 action include: (1) "injunctive relief sufficient to prevent the defendant from

[15] In other statutory schemes with *qui tam* actions, like the False Claims Act, the government may sue for damages or a private person—the relator—may file a *qui tam* action in the government's name and the relator receives only a portion of the proceeds. *See Vt. Agency of Nat. Res. v. Stevens*, 529 U.S. 765, 769 (2000). Strangely, H.B. 7 is the opposite.

violating Section 171A.051;" (2) "an amount of not less than $100,000 for each violation of Section 171A.051;" and (3) "costs and reasonable attorney's fees." H.B. 7, codified at Tex. Health & Safety Code § 171A.104(a). H.B. 7 does not require the person bringing suit to have suffered any injury traceable to the H.B. 7-defendant(s)' conduct that a court can remedy or have any real dispute with the defendant(s). Nonetheless, H.B. 7's language is plain.

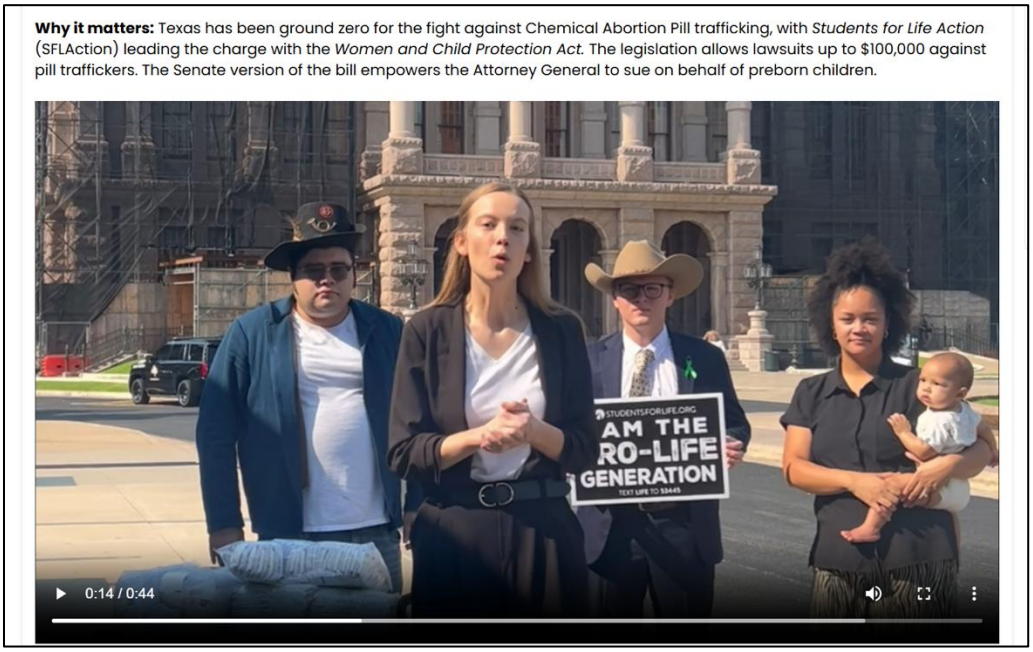
24. As to the financial award available to an H.B. 7 relator for a violation of the law, when the person bringing an H.B. 7 suit is anyone other than "a woman who was pregnant at the time the woman obtained or received an abortion-inducing drug" or "the father, sibling, or grandparent of the unborn child," H.B. 7 provides that: "the relator receives $10,000 of the total amount awarded" and the remainder "is held in trust by the relator for the benefit of a charitable organization designated by the relator." H.B. 7, codified at Tex. Health & Safety Code § 171A.104(b). The only limitation on the identity of the charitable organization is the relator may not choose an organization "from which the relator or any of the relator's family members receives a salary, stipend, or any type of remuneration or financial benefit." *Id*.

25. According to H.B. 7, "the courts of this state [Texas] have personal jurisdiction over a defendant sued" under H.B. 7 and "the defendant may be served outside this state [Texas]." H.B. 7, codified at Tex. Health & Safety Code § 171A.106(a).

26. H.B. 7 further states that a court adjudicating an H.B. 7 suit must apply Texas law and "may not apply the law of another state or jurisdiction," yet other standard provisions of Texas law, like the Texas Citizens Participation Act, Tex. Civ. Prac. & Remedies Code § 27.001 *et seq*, do not apply to H.B. 7 suits. H.B. 7, codified at Tex. Health & Safety Code §§ 171A.106-108.

27. Students for Life, by and through its lobbying arm, proudly advertised having "le[d][] the charge" in advocating for the passage of H.B. 7. In fact, in a video posted by Students

for Life's lobbying arm, Defendant Megan Roos is seen standing in front of the Texas State Capitol, announcing that she is "lobbying for House Bill 7."[16]



28. When H.B. 7 passed the Texas State Senate, Students for Life's lobbying arm lauded it as a "victory" for the organization, taking credit for the "SFLAction-inspired legislation" and noting that it had "been working" for several months "to get this legislation to Gov. Abbott's desk."[17]

C. Maria Puerto is in Dire Need of Resources to Support Her Children

29. Maria Puerto is a twenty-six-year-old single mother of two children, ages three and one. Ms. Puerto is a predominately Spanish-speaking citizen of the United States.

[16] SFLA Action Staff, *A Legislative Rollercoaster in Texas to End Chemical Abortion Pill Trafficking (Women & Child Protection Act)*, STUDENTS FOR LIFE ACTION (Aug. 26, 2025), https://www.studentsforlifeaction.org/a-legislative-rollercoaster-the-women-child-protection-act.

[17] Michael Allers, *BREAKING: SFLAction-inspired Legislation Passes in the Texas State Senate!*, STUDENTS FOR LIFE ACTION (Sept. 3, 2025), https://www.studentsforlifeaction.org/breaking-sflaction-inspired-legislation-passes-in-the-texas-state-senate.

30. Ms. Puerto never met her father until she was well into her teens. Growing up, her mother worked hard to make ends meet, but often struggled to pay for Ms. Puerto's school supplies.

31. For many years throughout her childhood, Ms. Puerto was sexually assaulted by a member of her family. She did not tell anyone of the abuse until she was an adult.

32. In 2022, Ms. Puerto and her boyfriend learned she was pregnant for the first time.

33. Because Ms. Puerto had been taking contraception pills every day without fail, the pregnancy came as a complete shock. Still, she did not have access to transportation or the economic resources to pay for travel out of state. And her mother, now elderly and disabled, was relying on her and her siblings for support. "It was either pay for my mom's medicine or get an abortion." Ms. Puerto had no choice but to continue the pregnancy.

34. At the time of her first unplanned pregnancy, Ms. Puerto was attending college on a scholarship. However, Ms. Puerto soon began suffering from debilitating morning sickness. She had to leave her college classes several times to vomit in the bathroom. Ms. Puerto was told that because these absences were "unexcused," her financial aid was revoked. With no way to pay for her classes, Ms. Puerto was forced to quit school, never to return. "My great desire was to help my community and my state through this career that I had chosen, but my state did not support me."

35. Ms. Puerto was also working at a local convenience store earning minimum wage. After her supervisor learned she was pregnant, Ms. Puerto was fired because she was taking too many bathroom breaks and could no longer do the heavy lifting the job required. By the time Ms. Puerto learned about the legal protections against pregnancy discrimination, the statute of limitations for such claims in Texas had already passed.

36. As her pregnancy progressed, Ms. Puerto felt her future had been taken from her. "I lost everything, my job, my career. Everything." Meanwhile, Ms. Puerto's pregnancy was taking a significant toll on her body. Around six months into her pregnancy, she got so swollen that she effectively became bedridden. Her doctors eventually determined that she had to be induced early. After laboring for 48 hours, Ms. Puerto's child was admitted to the NICU. Without a car, Ms. Puerto struggled to find transportation to the hospital to visit her child.

37. After her first child was born, she had no way to pay for childcare and no way to finish her degree. Finances became increasingly tight.

38. In 2024, Ms. Puerto became pregnant again and the cycle repeated. For the second time, she felt she had no other choice and was forced to carry the pregnancy to term.

39. Ms. Puerto struggled with severe depression throughout her second pregnancy, especially after she learned she was having a daughter. "When I found out I was having a girl, I felt so much pain. Since *Roe* was overturned, women have not experienced a free Texas. We have no ability to decide about our own bodies, our own families, our own lives."

40. Now, Ms. Puerto continues to struggle, both financially and emotionally. She and her two children share a bed in a small room in her mother's home. Ms. Puerto continues to look for work, but her mental health is poor and the requisite childcare costs exceed what she could earn at minimum wage.

41. Ms. Puerto and her children's father are no longer together. After Ms. Puerto learned she was pregnant a second time, their relationship shifted. "It's hard, because I lost my sense of self." He sees them occasionally for short visits and sends them a few hundred dollars a month.

42. Ms. Puerto wants to fight for her family and for other Texans like her. "Unfortunately, we live in a country where our human rights are not respected. But I believe that using our voices and being in community allows us to live with health, dignity and justice. And I will continue to fight so that one day, we experience true reproductive rights in Texas."

PARTIES

43. Relator Maria Puerto has no connection to Ms. Hawkins, Ms. Davis, Ms. Curry, Ms. Roos, or anyone else associated with Students for Life. Ms. Puerto did not suffer an injury traceable to their ordering of abortion pills that can be remedied by a court. Nonetheless—simply on the basis that she is "a person" who is not an officer or employee of this state or a political subdivision of this state—under H.B. 7's plain language, she can bring a civil suit under its provisions. She currently resides in Texas.

44. Defendant Kristan Mercer Hawkins is "a person" for purpose of H.B. 7. Ms. Hawkins was in Texas at the time of the events alleged in this petition. She currently resides in Teton Valley, Idaho.

45. Defendant Lydia Taylor Davis is "a person" for purposes of H.B. 7. Ms. Davis was in Texas at the time of the events alleged in this petition. She currently resides in Spring Lake, North Carolina.

46. Defendant Jamie Curry is "a person" for purposes of H.B. 7. Ms. Curry was in Texas at the time of the events alleged in this petition. She currently resides in Edgerton, Wisconsin.

47. Defendant Megan Roos is "a person" for purposes of H.B. 7. Ms. Roos was in Texas at the time of the events alleged in this petition. She currently resides in Dallas, Texas.

48. Through discovery, Relator may identify additional Defendants.

DISCOVERY CONTROL PLAN

49. Plaintiff requests that this case be conducted as a Level 3 case for the purposes of discovery, in accordance with Texas Rule of Civil Procedure 190.4.

JURISDICTION AND VENUE

50. According to H.B. 7, "the courts of this state" have original jurisdiction over all proceedings brought under its provisions and have personal jurisdiction over defendants sued under H.B. 7, regardless of where the parties reside. H.B. 7, codified at Tex. Health & Safety Code § 171A.106(a). The only limitation H.B. 7 places on "the courts of this state" is that the Fifteenth Court of Appeals has "exclusive intermediate appellate jurisdiction over any appeal or original proceeding arising out of an action brought under Section 171A.101 in the courts of this state." *Id*. § 171A.107.

51. Because H.B. 7 does not have its own venue provision, Texas's general venue rule applies. Tex. Civ. Prac. & Remedies Code § 15.002. Venue is appropriate in Harris County because that is where "a substantial part of the events . . . giving rise to the claim occurred," specifically the ordering of abortion pills in front of Space Center Houston. *Id.* § 15.002(a)(1).

52. H.B. 7 also gives "the courts of this state" jurisdiction to issue both injunctive and monetary relief. According to H.B. 7, when a relator prevails in their H.B. 7 claim, "the court shall award to the relator" both injunctive and monetary relief. H.B. 7, codified at Tex. Health & Safety Code § 171A.104(a).

53. H.B. 7 further protects an H.B. 7 relator from certain counterclaims, giving the courts of this state further jurisdiction to prohibit such actions. *See* H.B. 7, codified at Tex. Health & Safety Code § 171A.151.

JURY DEMAND

54. Plaintiffs hereby demand a trial by jury on all issues herein and pay the requisite jury fee.

CLAIMS

CLAIM I: MONETARY AWARD

55. The allegations in paragraphs 1 through 53 above are incorporated as if fully set forth herein.

56. According to H.B. 7, the courts of this state shall award "not less than $100,000" per violation to a relator who prevails in their H.B. 7 claim(s). H.B. 7, codified at Tex. Health & Safety Code § 171A.104(a)(2). There is no cap on the monetary compensation owed a relator.

57. Relator thus seeks a monetary award in the amount of $459,782 total from Ms. Hawkins, Ms. Davis, Ms. Curry, and Ms. Roos for their respective violations of H.B. 7 detailed in this petition.

CLAIM II: INJUNCTIVE RELIEF

58. The allegations in paragraphs 1 through 56 above are incorporated as if fully set forth herein.

59. According to H.B. 7, the courts of this state shall also award injunctive relief sufficient to prevent the defendant from violating Tex. Health & Safety Code § 171A.051.

60. Various persons associated with Students for Life, both known and unknown, are engaged in violations of H.B. 7.

61. Relator thus seeks injunctive relief sufficient to prevent Defendants, Students for Life, and anyone in privity or acting in concert or participation with Defendants and/or Students for Life from future violations of H.B. 7.

PRAYER FOR RELIEF

WHEREFORE, Relator asks this Court:

A. To enter a judgment against Defendants for violations of H.B. 7;

B. To enter a judgment against Defendants granting a monetary award in the amount of $459,782;

C. To issue injunctive relief that restrains Defendants, Students for Life of America, and anyone in privity or acting in concert or participation with Defendants and/or Students for Life of America from violating the Court's judgment;

D. To retain jurisdiction after judgment for the purposes of issuing further appropriate injunctive relief if the Court's judgment is violated; and

E. To such other and further relief as the Court deems just and proper.

Dated: October 13, 2026

/s/ Molly Duane

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