

July 14 Center for Medical Progress (CMP) releases the first in a series of misleading and heavily-edited videos targeting Planned Parenthood and lawful fetal tissue donation programs. Full footage of the first video mentioned NAF, our Annual Meetings, and our staff and members by name. NAF uncovers that the group, in consultation with Operation Rescue (OR), had acted for the past two years as a shell-company called BioMax, with the sole purpose of infiltrating the pro-choice community under the guise of being a legitimate tissue procurement company. They created a fake company, fake marketing materials, a fake website, and fake driver's licenses and business cards in order to fraudulently gain access to NAF's meetings and members, as well as several meetings convened by Planned Parenthood Federation of America, and others.

July 19 NAF asks the Department of Justice to hold a meeting of the Taskforce on Violence Against Health Care Providers

July 23 NAF retains the services of Morrison & Foerster LLP.

July 31 NAF files lawsuit in federal court seeking a temporary restraining order and preliminary injunction, which would prohibit the Center for Medical Progress, BioMax Procurement Services, David Daleiden (Executive Director of CMP), and Troy Newman (President of Operation Rescue and CMP board member) from releasing recordings and materials they illegally obtained by infiltrating two NAF Annual Meetings.

July 31 A judge in the U.S. District Court for the Northern District of California <u>issues a temporary</u> <u>restraining order (TRO)</u> enjoining the defendants from releasing anything from NAF meetings.

Aug 3 <u>Judge extends TRO in NAF's case</u>; orders expedited discovery in advance of the preliminary injunction hearing.

Aug 21 Discovery hearing in NAF's lawsuit. Counsel for the defendants notify the court that all defendants plan to plead the Fifth Amendment in response to the discovery requests.

Sept 18 Judge Orrick <u>rules</u> that corporations are not able to plead the Fifth Amendment in NAF's lawsuit. Defendants appeal.

Sept 23 Court of Appeals for the Ninth Circuit rejects the defendants appeal for a writ of mandamus and orders discovery in our case.

Oct 6 Judge Orrick <u>rules</u> that CMP must turn over all illegally recorded material to NAF before submitting it to Congress pursuant to a subpoena. Defendants appeal.

Early Oct Defendants turn over more than 500 hours of secretly recorded footage to NAF and Congress.

Oct 20 Internet troll Charles Johnson posts footage from NAF meetings on YouTube; claims he received the footage from a Congressional source. Judge rules Johnson must turn over all related documentation and sit for a deposition. NAF members featured in the videos and identified are targeted by threats and harassment almost immediately.

Oct 23 NAF <u>sends a letter</u> to Representative Jason Chaffetz urging a full investigation into the source of the leak and to take steps to protect the security of materials.

Oct 26 EMW Women's Surgical Center in Louisville, KY is vandalized by a man hurling himself at a window.

Early November NAF's President and CEO Vicki Saporta and NAF's Medical Director, Dr. Matthew Reeves, as well as a NAF member provide depositions as part of the discovery process in San Francisco. Defendants Troy Newman and David Daleiden also provide depositions. Depositions are also taken from CMP (with Daleiden representing the corporation) and from Charles Johnson.

Nov 13 EMW Women's Surgical Center in Louisville, KY is vandalized a second time.

Nov 13 NAF <u>files</u> a motion for a preliminary injunction against the defendants as well as other individuals who participated in their fake company and gained access to our meetings, and individuals and entities who received NAF's confidential information. The preliminary injunction motion seeks to prohibit the disclosure of any recordings or confidential information learned at NAF meetings, the dates and locations of any future NAF meetings, any recordings taken of members or attendees the defendants first made contact with at NAF meetings, and any attempts to gain access to future NAF meetings.

Nov 13 NAF files a contempt motion against CMP and Daleiden arguing that they violated a court order when they responded to the Congressional subpoena by releasing all the footage taken at NAF meetings. The court order clearly stated that CMP shall not provide to Congress any footage that did not address the narrow scope of the subpoena.

Nov 28 <u>Tragic shooting</u> at Planned Parenthood Rocky Mountains, Colorado Springs, an affiliate whose medical director was heavily featured in the smear videos.

Dec 3 Ninth Circuit <u>rules</u> that CMP must turn over the names of all the people with whom they shared NAF confidential information. Defendants appeal.

Dec 4 Supreme Court denies CMP's appeal.

Dec 17 Scott A. Orton, aka "Joseywhales," whose threats were first made public by and reported to the FBI by NAF <u>is arrested</u> for making death threats against an executive from a tissue procurement company featured in the smear videos.

Dec 18 Preliminary injunction hearing in San Francisco for NAF's lawsuit.

Jan 14 Planned Parenthood <u>files lawsuit</u> against CMP and BioMax.

Jan 25 A Texas grand jury investigating Planned Parenthood clears Planned Parenthood of wrongdoing and indicts both Daleiden and a co-conspirator on felony charges and one misdemeanor charge for Daleiden.

Feb 2 Judge Orrick <u>denies</u> Daleiden's request to submit footage as part of an amicus brief to the U.S. Supreme Court in support of Texas in *Whole Woman's Health v. Hellerstedt.*

Feb 4 Daleiden and co-conspirator <u>surrender</u> to authorities related to the Harris County felony and misdemeanor indictments.

Feb 5 NAF <u>is granted</u> a preliminary injunction against defendants with Judge Orrick writing: "Defendants did not—as Daleiden repeatedly asserts—use widely accepted investigative journalism techniques" and "The products of that Project—achieved in large part from the infiltration—thus far have not been pieces of journalistic integrity, but misleadingly edited videos and unfounded assertions (at least with respect to the NAF materials) of criminal conduct."

April 5 Investigators with the California Department of Justice <u>raid</u> David Daleiden's home pursuant to a warrant, seizing hard drives, computers, and more.

April 5 NAF <u>releases</u> violence and disruption statistics for 2015 showing a dramatic increase in threats, hate speech, criminal activity, and violence that directly correlates with the release of the defendants' smear videos.

April 18 CMP appeals NAF's preliminary injunction to the Ninth Circuit.

May 31 NAF files an answering brief to the Ninth Circuit in response to CMP's appeal.

June 7 Journalism scholars and journalists; constitutional law professors; fetal tissue researchers, scientists, physicians, medical and legal ethicists, and academics; the Southern Poverty Law Center and Feminist Majority Foundation; Physicians for Reproductive Health; and Planned Parenthood Federation of America and Planned Parenthood Affiliates of California file amicus briefs in support of the District Court's ruling granting NAF a preliminary injunction.

For any press requests or additional information, please contact: press@prochoice.org