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14 *International, Inc. & RealOptions, Inc.*

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15
16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 COUNTY OF ALAMEDA
18

19 THE PEOPLE OF THE STATE OF
20 CALIFORNIA,
21 Plaintiff,
22 v.
23 HEARTBEAT INTERNATIONAL, INC., and
24 REALOPTIONS, INC.,
25 Defendants.

Case No.: 23CV044940

**DECLARATION OF UYEN PHAM IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

1 I, Uyen Pham, declare and state as follows:

2 1. I am a former patient of RealOptions, Inc., who received Abortion Pill Reversal
3 treatment there. I am submitting this declaration in support of Heartbeat International's and
4 RealOptions' motion for summary judgment or, alternatively, summary adjudication. I am over 18
5 years of age and competent to submit this testimony. All of the matters discussed below are based
6 on my own personal knowledge and experience, and I could and would be competent to testify to
7 the facts stated herein if called as a witness in this case.

8 2. I obtained a Bachelor's degree in Healthcare Administration from California State
9 University, Sacramento, in 2007. I am currently employed by Alameda County as a human
10 resources generalist. I have never been employed by, or been a volunteer for, Heartbeat
11 International, Inc., or RealOptions, Inc.

12 3. In July 2024, I was about nine weeks along in my pregnancy and initially decided to
13 have an abortion. I saw an abortion provider for a medication abortion and received mifepristone
14 and misoprostol. Almost immediately after taking the mifepristone, I began to seriously regret my
15 decision to abort my child. I told a friend of mine about my change of heart.

16 4. The next day my friend told me she had stayed up all night researching my options
17 online. She then gave me a telephone number to call that she said she had located in her research.
18 When I called the number, I spoke with someone affiliated with Heartbeat International.

19 5. The individual I spoke with told me that there was a chance I could still save my
20 baby from the abortion and gave me the telephone number for RealOptions. At the time of my call
21 to Heartbeat International, it was less than 24 hours since I had taken mifepristone, and I had not
22 yet taken the misoprostol prescribed by the abortion provider. I was overjoyed when I learned that
23 there was an opportunity to potentially save my unborn child.

24 6. Using the telephone number provided by Heartbeat International, I promptly
25 contacted RealOptions and was scheduled for an in-office appointment that same day. At
26 RealOptions, I met with a counselor who provided me information about progesterone and the
27 course of treatment available. I was told that there was no guarantee of successfully saving my
28 child, and I was informed about potential side effects of the protocol. I knowingly and willingly

1 signed an informed consent form at RealOptions.

2 7. RealOptions administered both a pregnancy test to confirm my pregnancy and an
3 ultrasound to confirm that my baby was still alive. After these were completed, a nurse at
4 RealOptions gave me a progesterone injection. I later took additional progesterone orally. I then
5 had follow-up appointments with a nurse practitioner at RealOptions over the next several weeks.

6 8. I did not have pay anything to Heartbeat International or RealOptions, nor was I
7 ever asked by either of them to pay anything. I have never donated money to either entity.

8 9. As a result of the progesterone, the life of my unborn child was saved, and I later
9 gave birth to my wonderful son. My son had no birth defects, and I experienced no side effects or
10 complications from receiving and taking progesterone.

11 10. I am thankful for Heartbeat International and RealOptions for providing an
12 opportunity to save my child's life, and I have allowed RealOptions to share my story. I also
13 appeared in a video for RealOptions relating my experience.



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Figure 1: Baby Pham

25 I declare under penalty of perjury under the laws of the United States and the State of
26 California that the foregoing is true and correct. Executed on January 16, 2026,
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DocuSigned by:

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Uyeh Pham