

EXHIBIT F

Name: NOOR ABDALLA
DOB: [REDACTED]
Encounter Date: 03/07/2025

March 14, 2025

Dear Ms. Abdalla,

This letter confirms that you are a patient under my care for the management of your pregnancy and postpartum course. Your first prenatal appointment was on 9/27/2024 and your due date is 4/28/2025. Your pregnancy course is significant for increased risk of 1/106 for pre-eclampsia before 37 weeks. You have had monthly prenatal visits with me from September through February as well as ultrasound monitoring. As of the third trimester your visits are now scheduled every 2 weeks and will increase to weekly after 36 weeks gestation.

Sincerely,

[REDACTED]

Electronically signed by : [REDACTED] MD; Mar 14 2025 12:33PM Eastern Standard Time
(Author)

[REDACTED]

[REDACTED]

[REDACTED]

March 13, 2025

To Whom It May Concern:

I am Dr. [REDACTED]. My opinions and conclusions are based on my professional experience as a Board-Certified Family Medicine Physician with expertise in Obstetrics. I am not diagnosing or providing treatment for Ms. Noor Abdalla, but rather providing my professional medical assessment – based on my training and experience – of her condition and the risk posed by the incarceration of her husband. This letter is for legal purpose related to Mr. Khalil's incarceration, and I verify, under penalty of perjury, that it is based on my personal knowledge, and in accordance with CPLR R. § 2106 and 28 U.S.C. 1746, that the following is true and correct.

I earned a Bachelor of Arts from Pomona College in Claremont, CA and a Doctor of Medicine from the Icahn School of Medicine at Mount Sinai in New York, NY. I completed Family Medicine Residency at the Swedish Cherry Hill Family Medicine Residency in Seattle, WA. I am currently a core faculty physician at a residency program in New York State, where I oversee the Obstetrics curriculum, provide clinical care, as well as work on labor and delivery.

As a physician, I am very concerned about the health and safety of Ms. Abdalla, who is currently 33 weeks pregnant and experiencing the acute stress of witnessing the arrest and ongoing incarceration of her husband.

Psychological stress during pregnancy is known to increase the risk of adverse maternal and birth outcomes. These poor outcomes, such as preterm birth, low birth weight, and preeclampsia (hypertensive disorders of pregnancy), can be life-threatening for the mother and/or infant or have lasting repercussions on the child's health and cognition. A study demonstrated this association between maternal stress and poor outcomes by comparing neonatal outcomes in a town before and after a federal immigration raid. Sadly, low birth weight rates increased even among US-born pregnant women of the same ethnicity as those affected by deportation, showing how severe stressors impact pregnancy outcomes.¹ Pregnant women who experience these stressors can develop a hormonal imbalance, which negatively impacts the child in utero. I am alarmed that Ms. Abdalla, who was already determined to be at an increased risk for preeclampsia and prescribed medication for this earlier in her pregnancy, now faces an even greater likelihood of a poor birth outcome due to the stress of the incarceration of her husband.

Moreover, if a woman does have a poor birth outcome, she requires even more support during her recovery and while caring for a newborn who may have high medical needs. Having her spouse and the father of the child present for physical, psychological, financial, and logistical support is crucial. Without that support, she is at great risk for perinatal mood disorders such as depression.

Mitigating severe stress is urgent and important for the health of the pregnant woman and her child. Paternal involvement in pregnancy and labor has been shown to do just that - significantly improve maternal well-being and reduce rates of preterm birth, low birth weight, and even infant mortality.

In summary, given the high risk of poor outcomes due to maternal psychological stress and the benefits of paternal presence, I strongly recommend that Mr. Khalil be released to support Ms. Abdalla's health and that of their unborn child at this critical time.

Thank you for your consideration.

Please do not hesitate to contact me if I can provide additional evaluation or answer questions.

Sincerely,

A black rectangular redaction box covering the signature of the sender.

ⁱ Novak NL, Geronimus AT, Martinez-Cardoso AM. Change in birth outcomes among infants born to Latina mothers after a major immigration raid. *Int J Epidemiol.* 2017 Jun 1;46(3):839-849. doi: 10.1093/ije/dyw346. PMID: 28115577; PMCID: PMC5837605.