

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, et al.,

Plaintiffs,

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, et al.,

Defendants.

Civil No. 3:23-cv-00376

DECLARATION OF JOHN DOE

I, John Doe, pursuant to 28 U.S.C §1746, declare as follows:

1. I make this declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the matters stated herein.

2. I am a 12-year-old boy. I live with my parents in Tennessee, where I have lived my whole life.

3. I am in sixth grade. I like to play virtual reality games with my friends, including a game called Gorilla Tag. I recently tried out for and play on a private-league baseball team. I also like martial arts and I am working towards my black belt. I enjoy playing music too, and I play acoustic and electric guitar.

4. Both my sister and my cousin went into the Air Force, and that is what I would like to do too once I finish high school. After that, I would like to develop a career in the virtual reality and gaming world.

5. I am a transgender boy. I remember from a very early age getting really upset when people treated me like a girl. When I was 2 or 3 years old, I would cry if my parents tried to make me wear dresses. I didn't like pink or purple, instead I liked the color blue. I didn't want anything to do with dolls or dress-up or fairies, like the girls my age wanted to do. I wanted to play cops and robbers with the boys, and watch my dad play videogames. I remember taking dance classes as a young child, and I was frustrated that I couldn't dance the boy parts, or wear the boys' costume in the recitals. I told my mom repeatedly that I wanted to be a boy.

6. I chose a male name for myself early on, and started telling some friends and classmates that I was a boy. When my parents started using the name I chose and treating me as a boy in second grade, it felt amazing and I knew I wanted it to stay that way forever. When I came back to school as myself (a boy), after the Thanksgiving break, all my teachers were supportive, and my friends were great about my social transition too. Not everyone at school knows I am transgender. A lot of students have moved into the district since I came out in the second grade. It's important to me to keep control over information about being transgender to help make sure that I stay safe.

7. Approximately one year after my social transition, when I was nine years old, my mom bought me a book about puberty, and what to expect for a female puberty. I was so upset at the thought of those changes happening to my body. When I learned from my mom that medication could prevent that from happening, I knew I wanted to explore receiving that medication. I had seen some of my female friends begin puberty and I definitely knew I didn't want those changes to happen to my body.

8. I went to doctor's appointments with Dr. Brady at Vanderbilt University for what felt like a long period of time before they said I could start the medication. I remember my biggest

worry was just that the medication wouldn't work. I was so relieved when I finally started the medication.

9. Before I was prescribed the puberty-delaying medication, Dr. Brady reviewed the risks and benefits, and potential side effects of it, with my parents and me. I remember, for example, being told that the shots could cause pain, that the medication may slow my height growth for a period of time, and that there was a small chance of blood clots or a stroke, although those risks are unlikely for someone like me who does not have other health conditions or take other medication. Dr. Brady, my parents, and I all agreed that the potential benefits of the medication outweighed the risks. Apart from some occasional moodiness for a short period of time after the shot, I have not experienced any noticeable side effects.

10. As soon as the doctor thinks I am ready, I would also like to start taking testosterone so that I can continue developing as a boy. I know that the ban on this healthcare will block me from doing that in my home state, however, which is deeply upsetting.

11. Being able to take puberty-delaying medication and live as the boy that I am is very important to me. If I didn't have access to this medication I would have an incredibly difficult time wanting to be around other people and go to school, which would have a terrible effect on my grades. It's hard to imagine how I could even concentrate on anything else. I remember being obsessed with facial hair even as young as five years old, and once I'm a little older I can't wait until I have facial hair.

12. I cannot imagine losing control of my life like this for the next six years, until I turn 18. If I underwent the wrong puberty, I know some of those changes could be permanent. I also feel stress at the idea that we might need to travel to get this care because that would make things

harder for my family. We have talked about the possibility of moving out of state, but I really don't want to do that because all my friends are in Tennessee and this has always been my home.

13. This might seem like a small issue to others but it affects my whole world. I feel like I've gone through a lot to finally get to the happy, healthy place where I am and I desperately hope that doesn't all get taken away from me.

* * *

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

Dated: April 17, 2023

John Doe
John Doe