

Attachment 8

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

PETER POE, et al.,

Plaintiffs,

v.

GENTNER DRUMMOND, et al.,

Defendants.

Case No. 23-cv-00177-JFH-SH

**DECLARATION OF DONNA DOE IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

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

1. My name for the purposes of the above-captioned action is Donna Doe, a pseudonym.¹ I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction. I have personal knowledge of the facts set forth in this Declaration and could and would testify competently to those facts if called as a witness.

2. I am the legal guardian and next friend of my granddaughter, Daphne Doe, who I have raised since she was a toddler. We live in Cleveland County, Oklahoma.

3. Daphne is now 15 years old and a freshman in high school.

¹ Donna Doe and Daphne Doe are pseudonyms. My granddaughter (who is a minor) and I are proceeding under pseudonyms to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

4. Daphne is transgender. When she was born, her sex on her birth certificate was designated as male, but she is a girl.

5. When Daphne was a toddler, she was always full of joy, and so loving. I kept a box of dress up clothes for my grandchildren, and Daphne was always dressing up as a princess. She would frequently say to me, "I'm a girl."

6. When she was in preschool, maybe 4 years old, Daphne came home one day and told me about an activity where she and her classmates were separated by gender. Daphne told me that she did not know how to count herself because she was a girl, but in a "boy body."

7. Daphne loved to play with dolls. As she got older, she started to realize that boys were not supposed to play with dolls and would try to play with toys like puzzles when other people were watching. But I knew that she liked dolls, and she would play with them as soon as she was in the car or at home.

8. I made sure Daphne could try lots of activities when she was a child. I put her in Cub Scouts in first grade. She was standoffish and didn't like to leave my side when the boys would run off to play. I put her on a soccer team with boys, and she begged me to quit after a season. She always wanted to hang out with other girls. She really found her niche when she started theater.

9. Daphne has been in counseling since 2018.

10. In 2020, even before Daphne started puberty, Daphne told her therapist and me that she did not want to go through puberty as a boy. She wanted to be a girl and be seen by everyone around her as a girl or a woman.

11. When Daphne started puberty, she became depressed, anxious, and withdrawn. She seemed to be on a downward spiral.

12. In January 2021, Daphne's then-therapist diagnosed her with gender dysphoria.

13. At her therapist's recommendation, I contacted Dr. Lawlis at OU Children's Health to make an appointment.

14. In the spring of 2021, Dr. Lawlis also diagnosed Daphne with gender dysphoria. That summer, when she was 13, Daphne began taking puberty blocking medication. About a year later, in the spring of 2022, Daphne started taking estrogen.

15. We were so fortunate to have Dr. Lawlis. She made us feel knowledgeable and really understood what Daphne was going through. Dr. Lawlis clearly explained to me and to Daphne that puberty blockers were reversible, and would not cause permanent changes, but instead give us time to make sure this is what Daphne wanted. Dr. Lawlis also very carefully explained, before Daphne started estrogen, what changes would be permanent. We were supported by a whole team of professionals.

16. Once she started puberty blockers and then hormones, I saw a significant improvement in Daphne's well-being. Before she transitioned, she was very anxious and depressed, and had suicidal thoughts. She was very unhappy, especially when we didn't know what to do. Now, she is much happier and more stable than she was before. She still struggles sometimes, but in the way that all teenagers do.

17. Although Daphne was bullied in middle school when she came out as transgender, she has persevered and is thriving in ninth grade at a new high school, where she can be herself.

18. Because Daphne is very private, only a few teachers and administrators know that she is transgender. The blockers and estrogen allow Daphne to stay under the radar and avoid the bullying that she used to face.

19. Today, Daphne is excelling academically (she gets straight A's) and enrolled in rigorous AP classes. She is very focused on academics but hopes to start auditioning again for theater.

20. If the health care ban goes into effect, Daphne's access to Lupron and estrogen will be cut off. Those medications are essential to her ability to live as the girl she is and to avoid bullying from being outed as transgender. They have also helped tremendously with her mental health, and I am very worried that losing access to her care and being forced to detransition would bring back her anxiety, depression, and suicidal thoughts. I am scared about her risk of suicidality if she can no longer access her puberty blockers or hormones.

21. I am in my seventies, widowed, and retired. I am on a fixed income. Daphne's Lupron injections cost about \$14,000 every three months. It will be extremely difficult, if not impossible, for me to get Daphne the medical care she needs out of state because of the cost, and because Daphne's medical insurance will not cover out of state treatments. Even so, I have been researching how I might get her the care she needs out of state, even if we have to pay out of pocket for medications that are less effective than her current treatments.

22. I have lived in Oklahoma since 1980. I have a strong network of friends, who are very accepting of how I am raising my granddaughter. Many of my friends are conservative, but they are supportive and tell me that they would do the same thing for their child or grandchild. I love living here. My grown children are spread out. Moving out of state is not an option for me.

23. I want Daphne to have the option of staying in state for college, where I know she would get a great education, and then being able to decide whether she wants to leave the state for grad school or to broaden her horizons. But I do not want her to be forced out because she cannot live the way she is.

24. I want to do everything in my power to help Daphne. I believe that if I could talk to people and share stories about my family, things would change for the better for Daphne. I have learned so much through raising Daphne and this process. It is amazing how committed she is to being who she is. I think if people spent time with her, they would realize how profound it is. Being a girl is not a choice; it's who she is and has always been.

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

Executed in Cleveland County, Oklahoma on this 27 day of April 2023.

A handwritten signature in cursive script that reads "Donna Doe". The signature is written in black ink and is positioned above a horizontal line.

Donna Doe