

Attachment 11

**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 LYDIA LOE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Lydia Loe, pursuant to 28 U.S.C. §1746, declare as follows:

1. My name for the purposes of the above-captioned action is Lydia Loe, a pseudonym.¹ I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for Preliminary Injunction.

2. I am 16 years old, a minor, of sound mind, and in all respects competent to testify. 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.

3. My mother, Lauren Loe, is bringing claims in this lawsuit on my behalf.

4. We both live in Cleveland County, Oklahoma.

¹ Lauren Loe and Lydia Loe are pseudonyms. My parent 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.

5. I am a girl. When I was born, I was assigned “male” on my birth certificate. But that is wrong.

6. I have known that I am not a boy for a long time. It never fit. When I was around 9 or 10 years old, I realized that is because I am a girl.

7. I was raised in foster care and told my foster parent when I was 9 or 10 years old that I am a girl. But they did not want to deal with my transition or me being different, so I hid who I was while I was with them.

8. When I was around 13 years old, I told my new foster parents that I am a girl. But they had the same attitude – they did not support me being who I am.

9. When I was 13 years old, Lauren Loe became my foster parent. She adopted me and has made sure I have a safe and loving home. After about a year with her, I told her that I am not a boy, and she was supportive.

10. The COVID-19 pandemic and lockdown happened shortly after I started living with my mom and gave me the time to explore my true self in a safe environment. I started using a girl’s name, wearing girl’s clothes, and experimenting with my hair and makeup. I felt more like myself.

11. It felt good to be myself, but even after things started opening back up after the COVID lockdown, I was still scared to leave the house. I was worried people would just see me as a man wearing heels and makeup. People seeing me for who I am – a girl – is important. That is because that is who I truly and authentically am.

12. I started looking into estrogen and talked to my mom about it. In 2020, she took me to a doctor at OU Health, and I started seeing a counselor.

13. After about eight months of counseling, my doctor started talking to my mom and me about estrogen. She gave us a lot of information about estrogen, went over the risks and benefits with us, and told me to talk to my counselor about it. I was diagnosed with gender dysphoria. Several months later, I had another follow up at OU Health in 2022, and my doctor went through the informed consent process for starting estrogen with my mom and me and had blood tests done. Two years after I started counseling and over a year after I started talking to my doctor about estrogen, I got a prescription for estradiol and spironolactone and was able to start hormone therapy.

14. In early 2023, I was transferred from OU Health to Diversity Family Health Clinic to get my estrogen.

15. Since then, I have been receiving hormone therapy and counseling, and they have helped a lot. I have been taking estrogen for about six months, and I feel better mentally about myself and about my physical appearance. I used to hate my body, but, after taking estrogen, I am learning to love my body as a woman. Estrogen allows me to feel like and be myself. I am much more comfortable and authentic being a woman.

16. I love my family and my friends, and hormones have given me the confidence to leave my room and my house to spend time with them without the constant fear of being misgendered. I look like the person I know I am and can be my whole, true self.

17. My mom has talked to me about politicians in Oklahoma trying to ban girls like me from getting estrogen, and it is difficult for me to think about that. I only have a

limited supply of my medication, and I need to keep taking it. With estrogen, I feel more like myself. Without it, my body would grow out – I would become a man. I would feel like dying every day having to look at myself. I don't know if I would survive that.

18. If I cannot receive care in Oklahoma, I do not know what I will do. I don't want to leave Oklahoma. All the people I care about are here. I have done a lot of work on myself and my relationships in the last few years, improving my confidence, my patience, and my mental health. I am scared that being forced off estrogen and the distress of turning into someone I am not will undo all that hard work.

19. I just want to continue being myself.

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

Executed in Cleveland County, Oklahoma on this 1st day of May, 2023.

Lydia Loe

Lydia Loe