

# Exhibit

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CAUSE NO. \_\_\_\_\_

LAZARO LOE, *et al.*,

*Plaintiffs,*

v.

THE STATE OF TEXAS, *et al.*,

*Defendants.*

§ IN THE DISTRICT COURT OF  
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§  
§  
§ TRAVIS COUNTY, TEXAS  
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§ \_\_\_\_\_ JUDICIAL DISTRICT  
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**DECLARATION OF MARY MOE**

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1. My name is Mary Moe. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct. I would testify competently to these facts if called to do so.

2. I am the mother of Maeve Moe, my nine-year-old daughter, and her brother. I have been married to my spouse and Maeve’s father, Matthew Moe, for ten years.<sup>1</sup>

3. I am a member of PFLAG, which is also a plaintiff in this case.

4. My daughter Maeve is a sweet, intelligent child whom I love very much. She has always been curious and loved to learn; she began reading at a very early age. She loves geography, Girl Scouts, and dance, and she excels in school in the gifted and talented track. Her father and I are very proud of her.

5. Maeve is transgender. When she was born, she was assigned male, but she has vocally expressed from a very early age that she is a girl.

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<sup>1</sup> Mary Moe, Maeve Moe, and Matthew Moe are all pseudonyms. My daughter (who is a minor), her father, and I are proceeding pseudonymously to protect our right to privacy and ourselves from discrimination, harassment, and violence, as well as retaliation for seeking to protect our rights.

6. As soon as she could talk, Maeve expressed wanting girl things throughout toddlerhood into school age. One night she even asked me, “Will I ever like boy things?” When my mother bought Maeve a princess dress as a present, Maeve loved it and just beamed from ear to ear.

7. At first, we only let Maeve wear girls’ clothes at home, but we saw how anxious Maeve got when she had to put on boys’ clothes to leave the house. When she would be out in boys’ clothes, she would bite her nails, avoid eye contact, and her usual curiosity dampened. One day, when Maeve was about four years old and I was getting her dressed for preschool, Maeve broke down in tears saying she didn’t like her clothing. I cancelled her preschool that day and took her clothes shopping, telling her to get clothing that felt comfortable. Maeve picked out girl clothes and was overjoyed. I saw my child light up outside our home.

8. We had Maeve evaluated by a licensed professional counselor when she was five years old. The counselor recommended we affirm her gender identity to support her mental health and well-being. That was consistent with what we had experienced as a family; Maeve felt happiest when we allowed her to express herself as a girl. We want what is best for our daughter and so followed the counselor’s advice. We let Maeve wear the clothing she felt most comfortable in and used “she” pronouns for her.

9. In April 2019, Maeve’s primary care provider, a nurse practitioner, agreed with her counselor and wrote a letter of support for Maeve’s name change. The provider based this assessment on her observations of Maeve over the five years Maeve had been in her care, a review of scientific literature on transgender children, and consultation with Texas Children’s Hospital endocrinology unit.

10. Maeve legally changed her name when she was five and entered her kindergarten class as a girl. Most people do not know she is transgender.

11. When Maeve was about six, I took her to an endocrinologist. The endocrinologist taught Maeve how to monitor her body for signs of puberty so we would know when she would need to get puberty blockers. We visit this doctor every year to continue to evaluate Maeve. This endocrinologist has diagnosed Maeve with gender dysphoria.

12. Throughout elementary school, Maeve has lived openly as a girl and thrived. We spoke with her teachers, principal, and school administrators before she started school to tell them that Maeve is transgender, and it has not been a problem.

13. When my daughter begins puberty, she will need puberty blockers to prevent her body from changing in ways that do not align with her gender. Our doctor has said that it may be only a matter of months until Maeve will need them.

14. I have already discussed the potential side effects of puberty blockers with Maeve's doctors, with my husband, and with her. As parents, we have weighed the potential risks and benefits of this treatment, like we do for any of the medical conditions any of our children might have.

15. Maeve has lived openly as a girl since she was four years old, and being affirmed in her gender has helped her become the wonderful, intelligent young girl she is today. I am afraid of what would happen to her if Maeve was prohibited from receiving the health care she needs to live comfortably and safely in her body.

16. Maeve has always been concerned about her body changing in ways that do not match the girl she knows herself to be. The idea of that happening to her is extremely upsetting to Maeve.

17. When we first heard of the bill that became this law, we knew that it would affect Maeve's access to getting the care she needed in Texas and we might have to make drastic changes to make sure she had access to health care.

18. Because my daughter might need puberty blockers in the next few months, I am temporarily relocating out of state with her and my other child. Her father will stay behind to continue working in Texas. We all intend to return and reunite in our home once it is safe for Maeve to receive this care in the state.

19. I am heartbroken to have to take my children away from their home and their father, even temporarily. But I know that Texas is not a safe place for my daughter if this law forbids her access to this care.


20. My husband will continue to live in our house in Texas and I will keep my residency and professional license in Texas. Texas is our home. My husband and I want to continue to live and raise our children in the communities they have spent their whole lives in. We hope that once this law is struck down our family can be reunited in our home again.

21. My name is [REDACTED]. My date of birth is [REDACTED]. My address is [REDACTED]. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Montgomery County, State of Texas on Jul 9, 2023.

[REDACTED]

[REDACTED]

  
Mary Moe (Jul 9, 2023 21:27 CDT)

Mary Moe