

# 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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§  
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§ \_\_\_\_\_ JUDICIAL DISTRICT  
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**DECLARATION OF MATTHEW MOE**

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1. My name is Matthew 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 father of Maeve Moe, my nine-year-old daughter, and her brother. I have been married to their mother, my wife Mary Moe, for ten years.<sup>1</sup> We live in Montgomery County.

3. I am a member of PFLAG, another plaintiff in this case.

4. I am a fourth-generation Texan and have lived in Texas all my life. Both of my children were born in Texas and have lived here all their lives too.

5. I love my daughter Maeve very much. She is smart, excelling in school, funny, and kind. I am proud to be her father.

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<sup>1</sup> Mary Moe, Maeve Moe, and Matthew Moe are all pseudonyms. My daughter (who is a minor), her mother, 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. Maeve is transgender and has expressed her gender almost since she could speak. When she was born, she was assigned male, but she has vocally expressed from a very early age that she is a girl. She always wanted to wear girls' clothes as a small child. At first, her mother and I would only let her wear them in the house. During that time, Maeve cherished Halloween because it was the one night of the year she could wear whatever she wanted outside of the house.

7. When she was about five-years-old, Maeve saw a licensed professional counselor, who recommended that we support Maeve in being who she is. We realized we needed to support our child fully and let her wear clothing that fit with her gender all the time. We also started using "she" pronouns for Maeve and helped her pick a name that suited her better.

8. Her mother and I had Maeve's name legally changed and we fully support her in being herself in school, where everyone knows her as a girl. She has done well in her school environment as a girl. She is making friends and excelling academically.

9. Mary and I have had to educate ourselves about how to support Maeve. We did not know a lot about transgender issues, but we wanted to fully support our daughter. Having Maeve as our child opened our hearts and our minds. We did our research and spoke with an endocrinologist about how we could keep our child healthy and happy as she grew up.

10. Maeve will soon need puberty blockers to keep her body from masculinizing through puberty. The endocrinologist we consulted with told us that this will likely happen in a matter of months.

11. My wife and I have discussed the risks and benefits of puberty blockers, taking into account what Maeve's doctors have explained and recommend and what Maeve herself has

told us. Just like we always do for both our children and any medical issues they have, we are trying to make the best decisions we can to keep her safe and healthy.

12. I'm worried about what would happen if Maeve is not able to safely live as herself. Last summer I took the kids on a road trip and we stopped at a gas station to use the bathroom. I didn't think it was safe for Maeve to go into the women's room alone, so I took her and my son into the men's room instead. Maeve said she didn't feel comfortable using the men's room and went to the women's room. She was upset that it suddenly wasn't safe for her to use the restroom she always has, and the idea of having to use the men's room for her safety and even entering that men's room briefly shook her up. It took a few days after that for her to recover and be back to herself.

13. I never want my child to have to suffer because she is unable to safely be herself. Because we are afraid of Maeve not being able to access the medical care she needs to do so, my wife will be taking Maeve and her sibling to live with relatives out of state. They intend to return once we know it is safe for Maeve to get the medical care she needs in Texas. It saddens me that these are the drastic measures we have to take to ensure our child's health and happiness.

14. I will be separated from my wife and children during these months, as I am staying in Texas to care for our home and continue my job. I will miss my family during this time but know that it is the best choice to keep Maeve safe, even if I cannot be with her. I hope that this law is ruled against so that my family will be able to safely come home again.

15. 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]

*M. Moe*

Matthew Moe (Jul 9, 2023 15:28 CDT)

Matthew Moe