

# **Exhibit Q**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

PFLAG, INC.; *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States; *et al.*,

*Defendants.*

Civil Action No.

**DECLARATION OF JANE DOE 3**

I, Jane Doe 3, hereby declare and state and follows:

1. I am over 18 years of age, of sound mind, and in all respects competent to testify.
2. I have personal knowledge of the facts set forth in this declaration and would testify competently to those facts if called to do so.
3. I live in New York City with my husband and our two children.
4. My family is a member of PFLAG.
5. One of my children, Jamie Doe, is nine years old.
6. Jamie was assigned male at birth, but she is not a boy. She is our daughter, and she is transgender.
7. From 18 months old, my daughter expressed a feminine gender. We would buy Jamie all kinds of clothes in many different colors, but Jamie would only wear pink pajamas. Jamie specifically learned how to change her clothes so that she could put on girly clothes whenever she wanted.

8. She has been in supportive care, including therapy, off and on since she was 3 years old as needed.

9. The first time Jamie wore a dress, she was so excited that she changed her clothes in the street. I was worried that someone would say something unkind to her, but instead, an older woman told Jamie, "Oh how beautiful!"

10. About four years ago, Jamie told us that we should use "she" or "they" pronouns for her, and two years ago that she wanted to be called "Jamie," not by her birth name, which was more stereotypically associated with boys. We asked Jamie's school to make those changes, and they were very accepting and affirming. Jamie has since asked us to change her gender marker to "F" to reflect that she is a girl, and we have changed her vital documents to reflect her name and gender.

11. About a year ago, we had an intake appointment with a transgender health clinic. We started to look for signs of puberty, which we thought Jamie might be starting. Because Jamie is not a boy, starting a male puberty would be distressing for her. She does not tolerate anyone using male pronouns for her, and being seen as (or being forced to see herself as) male would be enormously distressing. She has been diagnosed with gender dysphoria.

12. After careful consultation with Jamie's doctors, our own research, and taking into account Jamie's wishes and well-being, we decided that she should get a puberty blocking implant to stop male puberty from progressing. This will give her time to further explore her gender without the distressing changes of a puberty that does not match her gender. After weighing the risks and benefits, including the risks of doing nothing, we decided as her parents that this was the best decision to treat her gender dysphoria and prevent it from worsening in the

future. Her psychiatrist wrote a letter of support, and she underwent testing including bone scans. She was scheduled for a pubertal blocking implant at NYU Langone for the last week in January.

13. On Tuesday, January 28, 2025, the White House issued an Executive Order entitled "Protecting Children from Chemical and Surgical Mutilation" (the "Executive Order").

14. On Wednesday, January 29, I called NYU Langone to make sure that Jamie's insurance coverage for her implant had gone through. When NYU called back later that afternoon, I assumed it was for details of the surgery. Instead, I was told that NYU was cancelling her surgery and no longer providing any trans-affirming medical care because of the Executive Order. They did not know when they would be able to reschedule.

15. I am so worried about Jamie. She is a great kid, and doing well in school, where everyone is affirming and supportive. She is definitely not a boy, and a male puberty would be so wrong for her. I am devastated at the thought that I will not be able to get my child the medical care she needs. I have been trying to get her rescheduled somewhere, but I do not know whether I will be able to get her what she needs to stop her gender dysphoria from worsening as she matures.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief.

Dated this 4 day of February 2025.

  
Jane Doe 3