

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY**

JANE DOE 1, *et al.*,

Plaintiffs,

v.

WILLIAM C. THORNBURY, JR., MD, in his
official capacity as the President of the Kentucky
Board of Medical Licensure, *et al.*,

Defendants.

Case No. 3:23-cv-00230-DJH

**DECLARATION OF JANE DOE 1 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Jane Doe 1,¹ hereby declare and state as follows:

1. I am over the age of 18, of sound mind, and in all respects competent to testify. I have personal knowledge of the information contained in this Declaration and would testify completely to those facts if called to do so.

2. I am a plaintiff in this Action, and I am the parent and next friend of my minor child, John Minor (“JM”) Doe 1, who is also a Plaintiff in this action.

3. I am a Kentucky resident. I live in Jefferson County with my husband and three children.

¹ Because of concerns about my child’s privacy and safety, I have moved to proceed in this case under a pseudonym. *See Pls.’ Mot. for Leave to Proc. Pseudonymously*, ECF No. 1. I have contemporaneously signed with my legal name a separate copy of this declaration. My attorneys have a copy of that separate declaration.

4. My son, JM Doe 1, who is also a Plaintiff in this action, is a twelve-year-old transgender boy.

5. When JM Doe 1 "came out" as transgender when he was about eleven, I was not surprised. He had come out to my husband and me as nonbinary a few years previous, and as a lesbian before that. When he was a little boy, he asked, "Mom, did you always know you were a girl?"

6. When JM Doe 1 began puberty and started menstruating in December 2021, his mental health declined dramatically. He became suicidal during and around his periods. In Spring 2022, after his second period, my husband and I hospitalized JM Doe 1 because he told a classmate that he wanted to die.

7. That fall, JM Doe 1 was diagnosed with gender dysphoria. His diagnosis was the result of numerous hours of interviews with therapists, psychiatrists, a pediatric nurse practitioner, and an endocrinologist.

8. Managing JM Doe 1's depression and suicidality has always been my main priority. My husband and I worked closely with JM Doe 1's doctors to come up with a treatment plan. In November 2022, JM Doe 1 began taking puberty blockers to stop his periods. My husband and I saw an immediate improvement in his emotional and mental health. It did not take long for JM Doe 1 to return to the happy child he used to be before his first period. Taking puberty blockers has dramatically reduced JM Doe 1's suicidality. JM Doe 1 continues to receive hormone treatment in Kentucky.

9. My husband and I are very concerned about what might happen to JM Doe 1 if the Treatment Ban prevents him from being treated with puberty blockers in Kentucky. My son and husband have described this treatment as a "lifesaving and life changing experience." I do not

know whether our family will be able to obtain this treatment out-of-state. We worry that JM Doe 1's symptoms of distress will return without continued treatment.

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

Executed this 22nd day of May 2023.

/s/ Jane Doe 1
Jane Doe 1