

**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.

Civil No.: 3:23-CV-00230-DJH

**DECLARATION OF JOHN DOE 2 IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, John Doe 2,¹ 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 2, who is also a Plaintiff in this action.
3. I currently reside in the Eastern District of Kentucky with my sister and son.
4. My son, JM Doe 2, is a fifteen-year-old transgender boy.

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.

5. When JM Doe 2 was in the first grade he would occasionally ask to be called by a male name and male pronouns. He has always preferred “boy’s” clothes, and, from a young age, periodically questioned whether something was “wrong” with him.

6. JM Doe 2 “came out” as a boy at home and at school in about the seventh or eighth grade. As part of his coming out process, JM Doe 2 cut his hair and began using male pronouns. He recently even obtained a legal name change. When JM Doe 2 began puberty and started menstruating, he felt depressed and distressed by the mismatch between his body and gender identity.

7. I have seen numerous healthcare professionals with JM Doe 2. After many evaluations and careful discussions regarding the risks and benefits of treatment, JM Doe 2 began receiving gender-affirming medications. He first began using birth control pills to stop his periods. He then began testosterone treatment. He continues to receive this care in Kentucky. He also sees a therapist.

8. Hormone therapy has significantly improved JM Doe 2’s mood and sense of self. For instance, JM Doe 2 feels tremendous pride when he sees his body changing to match his male identity. I have never seen JM Doe 2 as happy as he is now that he is receiving the treatment. JM Doe 2 has not experienced any negative impact by the use of the hormone therapy.

9. I believe that if the Treatment Ban prevents JM Doe 2 from continuing with his treatment – the birth control and testosterone – that JM Doe 2 would revert to his previous mental state. JM Doe 2 has told me that he cannot imagine his life without this medical treatment. I do not know whether my family will be able to obtain this treatment out-of-state.

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

Executed this 22nd day of May 2023.

/s/ John Doe 2
John Doe 2