

**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 3 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, John Doe 3,<sup>1</sup> 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, as well as the parent and next friend of my minor child, Jane Minor ("JM") Doe 3, who is also a Plaintiff in this action.

3. I am a Kentucky resident. I live in Jefferson County, Kentucky with my daughter, JM Doe 3, and my wife.

4. My daughter, JM Doe 3, who is also a Plaintiff in this action, is an eleven-year-old transgender girl.

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<sup>1</sup> 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. JM Doe 3 has known since a very young age that she is a girl. She started asking for “girl’s” clothes when she was six; she grew out her hair when she was eight and stopped using her birth name when she was nine.

6. JM Doe 3 told my wife and me that she is a girl in March 2022, when she was nine. Because of the stigma associated with transgender identity, we feared for her safety.

7. At the start of fifth grade, shortly after “coming out” to me, JM Doe 3 socially transitioned. Although some of our fears came true, and JM Doe 3 faces some bullying at school and has been rejected by several family members, she has mostly been accepted by peers and family.

8. My wife and I identified a psychologist for JM Doe 3 after extensive research and consultations. JM Doe 3 now receives mental health care for gender dysphoria and generalized anxiety disorder.

9. JM Doe 3’s psychologist diagnosed her with gender dysphoria in Spring of 2022. We were then referred to a pediatric endocrinologist.

10. Our initial appointment with the pediatric endocrinologist lasted more than two hours and included a thorough evaluation of JM Doe 3’s mental and physical health, as well as a detailed explanation of the different options available to her.

11. In January 2023, after considering the various treatment options, my wife and I consented to have a pediatric surgeon implant a device in JM Doe 3’s arm to administer puberty blockers. The surgeon explained the risks associated with the treatment and examined JM Doe 3’s motivations for and comprehension of the procedure. My wife and I were and remain comforted by the knowledge that JM Doe 3’s treatment is not only supported by all major US medical associations, but is also reversible.

12. JM Doe 3 continues to receive treatment in Kentucky. An endocrinologist frequently monitors JM Doe 3's implant. JM Doe 3's next appointment with her endocrinologist is in June 2023.

13. JM Doe 3's endocrinologist has informed us that she will no longer be able to treat JM Doe 3 once the Treatment Ban goes into effect on June 29 and will instead have to refer us out-of-state. My wife and I are unsure whether we will be able to obtain out-of-state care for JM Doe 3.

14. Puberty blockers have made JM Doe 3's gender dysphoria and anxiety symptoms more manageable. My wife and I are fearful of the physical, emotional, and psychological consequences of discontinuing them. We worry that JM Doe 3's symptoms of distress will return without continued treatment.

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

Executed this 22<sup>nd</sup> day of May 2023.

/s/ John Doe 3  
John Doe 3