

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

EQUALITY FLORIDA; FAMILY EQUALITY; M.A., by and through his parent AMBER ARMSTRONG; S.S., by and through her parents, IVONNE SCHULMAN and CARL SCHULMAN; ZANDER MORICZ; LINDSAY MCCLELLAND, in her personal capacity and as next friend and parent of JANE DOE; RABBI AMY MORRISON and CECILE HOURY; DAN and BRENT VANTICE; LOURDES CASARES and KIMBERLY FEINBERG; LINDSEY BINGHAM SHOOK; ANH VOLMER; SCOTT BERG; and MYNDEE WASHINGTON,

Plaintiffs,

v.

FLORIDA STATE BOARD OF EDUCATION; THOMAS R. GRADY, BEN GIBSON, MONESIA BROWN, ESTHER BYRD, GRAZIE P. CHRISTIE, RYAN PETTY, and JOE YORK, in their official capacities as members of the Board of Education; JACOB OLIVIA, in his official capacity as Commissioner of Education of Florida; FLORIDA DEPARTMENT OF EDUCATION; BROWARD SCHOOL BOARD; SCHOOL BOARD OF MANATEE COUNTY;

Civil Action No. 4:22-cv-0134-AW-MJF

SCHOOL BOARD OF SARASOTA COUNTY; SCHOOL BOARD OF MIAMI-DADE COUNTY; ORANGE COUNTY SCHOOL BOARD; ST. JOHNS COUNTY SCHOOL BOARD; and PASCO COUNTY SCHOOL BOARD;

Defendants.

DECLARATION OF PLAINTIFF S.S. IN SUPPORT OF PLAINTIFFS' MOTION TO LIFT THE STAY OF DISCOVERY

Pursuant to 28 U.S.C. § 1746, I, S.S., declare as follows:

1. I have personal knowledge of the below facts, which are true and accurate to the best of my knowledge.
2. I am a 17-year-old senior at Miami Beach Senior High School, where I participate in the International Baccalaureate (“IB”) program.
3. As part of the IB curriculum, students complete a community service project.
4. My friend informed me that for their service project, they wanted to create a website dedicated to LGBTQ resources. When my friend proposed this project to the IB Coordinator, the IB Coordinator told them that they could not complete this project because of concerns over whether it would be prohibited by HB 1557.
5. Because of this, my friend is not doing the proposed project.

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

Executed on September 9, 2022 in Miami, Florida.

A handwritten signature in dark ink, consisting of several fluid, connected strokes, positioned above a horizontal line.

S.S.

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2022, true and correct copies of the foregoing Declaration of Plaintiff S.S. in Support of Plaintiffs' Motion to Lift the Stay of Discovery were duly served upon all parties via ECF.

Dated: New York, NY
September 12, 2022



Roberta A. Kaplan, Esq.