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Attorneys for Defendants Centurion of Idaho, LLC and Centurion Health

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

JANE ROE, JANE POE, JANE DOE,

Plaintiffs,

v.

RAUL LABRADOR, in his official capacity
as Attorney General of the State of Idaho;
BRAD LITTLE, in his official capacity as
Governor of the State of Idaho; JOSH
TEWALT, in his official capacity as the
Director of the Idaho Department of
Corrections; BREE DERRICK, in her official
capacity as the Deputy Director of IDOC;
CENTURION OF IDAHO, LLC;
CENTURION HEALTH,

Defendants.

Case No. 1:24-CV-00306-CWD

**DECLARATION OF JOHN MAY, M.D.,
F.A.C.P., IN FURTHER RESPONSE TO
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER,
PROVISIONAL CLASS
CERTIFICATION, AND PRELIMINARY
INJUNCTION BY DEFENDANT
CENTURION OF IDAHO, LLC**

**DECLARATION OF JOHN MAY, M.D., F.A.C.P., IN FURTHER RESPONSE TO
PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER, PROVISIONAL
CLASS CERTIFICATION, AND PRELIMINARY INJUNCTION BY DEFENDANT
CENTURION OF IDAHO, LLC - 1**

DECLARATION OF JOHN MAY, M.D., F.A.C.P.

I, John P. May, M.D., F.A.C.P., declare that this declaration is made of my own personal knowledge, that I am competent to testify as to the matters stated herein, and that the following statements are all true and correct:

1. I am Chief Medical Officer for Centurion, LLC. I also currently serve as the acting Statewide Medical Director for Centurion of Idaho, LLC (“Centurion”), which is the healthcare contractor for the Idaho Department of Corrections (“IDOC”).

2. In my capacity as Chief Medical Officer and the currently acting Statewide Medical Director, I am familiar with the care and treatment provided to individuals in custody of IDOC who have been diagnosed with gender dysphoria.

3. Currently, there are between 60 to 70 patients in IDOC’s custody who have been diagnosed with gender dysphoria.

4. Prior to July 1, 2024, 54 of those patients were receiving hormone therapy as a treatment for their gender dysphoria diagnosis. Centurion was providing hormone therapy to these 54 patients because, in each patient’s case, a medical or mental health professional had prescribed the treatment.

5. The named plaintiffs in this lawsuit are among the 54 patients receiving hormone therapy as of July 1, 2024.

6. Since July 1, 2024, the named plaintiffs have continued to receive hormone therapy, just as they did prior to that date.

7. Since July 1, 2024, Centurion’s medical staff has been tapering all patients other than the named plaintiffs off of hormone therapy. Tapering was initiated to comply with House

Bill 668, codified as Idaho Code Section 18-8901, which was enacted by the Idaho Legislature, signed by the Governor, and became effective on July 1, 2024.

8. While the length of time needed to taper an individual off of hormone therapy varies based on patient-specific circumstances, Centurion expects that all patients, other than the named plaintiffs, will be fully tapered off of hormone therapy within the next several weeks. Patients undergoing tapering are also receiving increased mental health care and evaluation.

Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true.

DATED this 23 day of July 2024.


John P. May, M.D., F.A.C.P

CERTIFICATE OF SERVICE

I certify that on this 23rd day of July 2024, I electronically filed the foregoing document with the U.S. District Court. Notice will automatically be electronically mailed to the following individuals who are registered with the U.S. District Court CM/ECF System:

Paul Carlos Southwick	<input type="checkbox"/>	U.S. Mail, postage prepaid
Emily Myrei Croston	<input type="checkbox"/>	Hand-Delivered
ACLU OF IDAHO FOUNDATION	<input type="checkbox"/>	Overnight Mail
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Chase B. Strangio*	<input type="checkbox"/>	U.S. Mail, postage prepaid
Malita Picasso*	<input type="checkbox"/>	Hand-Delivered
AMERICAN CIVIL LIBERTIES	<input type="checkbox"/>	Overnight Mail
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/s/ Christina M. Hesse

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