

The Honorable Lauren King

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,  
  
  Plaintiffs,  
  
          v.  
  
DONALD J. TRUMP, in his official  
capacity as President of the United States,  
et al.,  
  
  Defendant.

NO. 2:25-cv-00244-LK  
  
SUPPLEMENTAL  
DECLARATION OF PHYSICIAN  
PLAINTIFF 1 IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY INJUNCTION  
  
NOTE ON MOTION CALENDAR:  
February 28, 2025 at 2:00 p.m.

1 I, Physician Plaintiff 1, declare as follows:

2 1. I am a Plaintiff in this action. I bring my claims on behalf of myself and my  
3 patients. I offer this declaration in support of Plaintiffs' Motion for Preliminary Injunction. I  
4 have personal knowledge of the facts set forth in this declaration and could testify competently  
5 to those facts if called as a witness.

6 2. This declaration incorporates and supplements my declaration dated February 5,  
7 2025, submitted as Dkt. #13.

8 3. After I heard about the Court's Temporary Restraining Order issued on  
9 February 14, 2025, I felt an enormous sense of relief. Since Executive Order 14,187 targeting  
10 transgender and gender-diverse adolescents and their doctors was issued, I have worried  
11 constantly about whether I would be able to continue providing gender-affirming care to my  
12 patients. I have been carrying the heavy weight of knowing that my patients could lose their  
13 health care at any moment. I have seen many of my colleagues struggle as their institutions chose  
14 to shutter their gender-affirming care programs as a result of the Executive Order.

15 4. After the TRO was issued, I felt like I could finally breathe again. The same was  
16 true for my colleagues in Plaintiff states who I spoke to about the TRO. Hearing about the TRO  
17 gave me hope that maybe the federal government would not be able to harm me and my patients  
18 in the way they had announced they would.

19 5. There was a staff meeting on Friday afternoon just a few hours after we learned  
20 about the Court's ruling. The fact that the TRO was issued was the first thing we shared at the  
21 meeting. There was a general sense of excitement. Some staff members were crying tears of joy.  
22 One physician wanted to immediately call two of her patients to let them know about the Court's  
23 ruling because those patients had been so distressed about the prospect of lost care when she had  
24 seen them in clinic the day prior. Staff members recounted how hard it has been meeting with  
25 patients and their families since Executive Order 14,187 was issued. Our patients and their  
26

1 families have been terrified that Executive Order 14,187 will prevent us from being able to  
2 continue providing gender-affirming care.

3 6. While the Court's temporary Order has provided me with an immediate sense of  
4 relief, I am aware that the TRO only lasts for 14 days and that makes me nervous. Without more  
5 permanent relief, I am concerned that medical institutions, including the one in which I practice,  
6 will stop providing gender-affirming care because they fear they will lose federal funding or put  
7 their providers at risk of being investigated or prosecuted.

8 7. I spoke with a physician colleague in another state last week whose institution  
9 forced them to stop providing gender-affirming care because of Executive Order 14,187. That  
10 colleague recounted how they were trying to send prescription refills in to all their patients as  
11 quickly as possible to help "buy them time," to try to establish care elsewhere. They expressed  
12 how scared they were for their patients given the dearth of other adolescent gender-affirming  
13 care providers in their state. They described the utter devastation they felt as a physician being  
14 told by their institution that they could no longer provide the medical care that their patients and  
15 their families both needed and wanted.

16 8. I am thankful that the institution at which I provide clinical services is still  
17 allowing me and my colleagues to continue providing gender-affirming care, but I'm also  
18 cognizant that this could quickly change if we aren't able to obtain more stable, long-lasting  
19 protection from the Court. Providers of gender-affirming care are terrified right now. Many of  
20 us are facing immense pressure from within the institutions we work to discontinue aspects of  
21 the clinical care we provide and research we conduct. I know from talking to colleagues in other  
22 states and leadership at my own institution that the outcome of this lawsuit is probably the  
23 difference-maker in whether my institution, and other institutions like mine in other states, can  
24 continue to offer gender-affirming care.

25 9. For instance, I know of at least three different gender-affirming care providers in  
26 Washington State that are looking to me and the clinic I work in to determine whether or not

1 they continue to provide gender-affirming care. Even though they don't work at my institution,  
2 they are looking at what happens at my institution to guide their own next steps. I believe that if  
3 my place of work stops providing gender-affirming care, other providers in Washington will do  
4 the same.

5 10. If this happens, it will make it so that only a small number of the most affluent  
6 families, who can afford to pay out of pocket at purely private facilities that don't accept federal  
7 funding will be able to obtain necessary medical care for their child. Many of the patients I serve  
8 won't be able to afford to do this, and I worry the impact on them and their families will be  
9 devastating.

10 11. Physicians who receive federal research grants are particularly vulnerable. I  
11 worry about whether my own federal research grants will continue to be funded, or whether I  
12 will be able to continue to secure ongoing research funding to support my family.

13 12. Physicians also need this Court's continued protection to shield them from  
14 baseless prosecutions by the federal government for providing gender-affirming care. I worry  
15 about having federal agents show up at my home or the clinic where I work because of the  
16 medical care that I provide.

17 13. I even worry about traveling out of state. There are already certain states that I  
18 won't travel to because of laws that those states have passed criminalizing gender-affirming care.  
19 But I now also have to worry about the federal government coming after me, even in Washington.  
20 I'm not sure if I can express how terrifying that is. Over the last two weeks I have had trouble  
21 sleeping. I worry about the federal government taking me to jail or separating me from my  
22 family. I need this Court's continued protection to keep the federal government from  
23 investigating me or my colleagues for providing lawful, medically-indicated gender-affirming  
24 care to adolescent patients in Washington State.

1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States of America that the foregoing is true and correct.

3 DATED this 18<sup>th</sup> day of February 2025 at Seattle, Washington.

4 Physician Plaintiff 1, MD  
5 PHYSICIAN PLAINTIFF 1, MD  
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