

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.,

Defendants.

NO. 2:25-cv-00244-LK

SUPPLEMENTAL DECLARATION
OF PHYSICIAN PLAINTIFF 3 IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION

NOTE ON MOTION CALENDAR:
February 28, 2025 at 2:00 p.m.

1 I, Physician Plaintiff 3, 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
7 February 5, 2025, Dkt. #15.

8 3. I have felt incredibly anxious ever since Executive Order 14,187 was issued.
9 Before I heard about the Court's decision on Friday, I was worried that I would be told that I
10 would have to stop providing gender-affirming care to my patients because of the Executive
11 Order. I am aware of healthcare institutions across the country shutting their doors to transgender
12 and gender-diverse patients because of the Executive Order and I've been scared and stressed
13 that the same thing would happen in Washington.

14 4. I have been grappling with what it would mean for me ethically, as a pediatric
15 endocrinologist, if I was told that I had to stop providing gender-affirming care to my patients. I
16 do not think I could live with myself as a physician if I could no longer provide gender-affirming
17 care. Ethically speaking, I don't think I could continue to provide hormone-related medical care
18 to my cisgender patients if I was not allowed to provide that same care to my transgender and
19 gender-diverse patients. Discrimination of that kind is ethically prohibited, and considering that
20 scenario has caused me moral injury.

21 5. Over the last couple of weeks, I have been trying to figure out if there is a place
22 I could practice medicine that doesn't accept federal funding, or whether I could set up my own
23 medical practice so that I could continue providing care to both my cisgender and transgender
24 patients on an equal basis. Leaving my current job would be a financial hardship for myself and
25 my family but is something I would feel morally obligated to do if I was told I had to stop
26 providing gender-affirming care. Starting a private medical practice would be challenging, risky,

1 and expensive. Additionally, I would only be able to provide care to a limited subset of affluent
2 patients who could afford private care. This troubles me ethically, too, because my patients need
3 gender-affirming care regardless of their socioeconomic status.

4 6. As long as my institution continues to receive protection from this Court, I believe
5 I will be able to continue providing equal medical care to all of my patients. While I felt
6 immediate relief upon learning about this Court's order, the worry and fear began to build again
7 when I read the Court order and learned that it is limited to 14 days. I understand that is the
8 maximum amount of time an order like this can last. But longer-term protection is crucial for me
9 to be able to continue providing gender-affirming care in my current clinical setting because it
10 relies on federal grant funds and serves patients and families that rely on Medicaid.

11 7. My fellow physicians and I also need continued protection from this Court to
12 prevent the Federal Government from criminally investigating us for providing gender-affirming
13 care to adolescents in Washington. While I mostly worry about how the Executive Order will
14 impact my patients and their ability to get necessary, life-saving medical care, the section of the
15 Executive Order on criminal prosecution makes me scared for myself, my family, and my
16 physician colleagues. I think the threat of criminal prosecution by the Federal Government is a
17 scare tactic meant to bully me. My family fears that by continuing to provide gender-affirming
18 care, there could be criminal investigation and prosecution because of the Executive Order. We
19 especially feel worried about criminal investigation when traveling out of state to places that do
20 have state gender-affirming care bans. Having an Order from this Court preventing the Federal
21 Government from investigating or prosecuting doctors who are providing gender-affirming care
22 that is lawful in the states where they practice makes me feel safer.

23 8. I am also thankful for the protections that this Court's order provides to my
24 patients, and I hope it is extended. Before this Court's order was issued my patients were feeling
25 incredibly stressed and anxious and many were talking about trying to move out of the country.
26 I believe continued protection from this Court will give my patients and their families some

1 much needed relief and help calm their fears of immediately losing access to this critical medical
2 care.

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

5 DATED this 18 day of February 2025 at Seattle, Washington.

6 *Physician Plaintiff 3*
7 _____
8 PHYSICIAN PLAINTIFF 3, MD