

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

In Re. 2025 Subpoena to Children's National
Hospital

Case No.: _____

DECLARATION OF PARENT D.D.

1. I am the parent of Child D.D., a minor who received medical care at Children's National Hospital ("CNH") between March 2022 and December 2024.
2. Throughout my child's care at CNH, my child, other family members, and I met with CNH providers and medical professionals. We also communicated with CNH by phone and through electronic messages.
3. In the course of these visits and communications, my child and I revealed sensitive information concerning my child's mental health, physical development, and their relationships in school, with peers, and with other family members. All of these disclosures were made to CNH medical providers for the purposes of diagnosis, formulation of treatment recommendations, and development of an appropriate treatment plan.
4. During the course of my child's care at CNH, my child participated in a mental health assessment conducted by a licensed mental health provider and received social and psychological support, all of which included sensitive and confidential conversations.
5. During the course of my child's care, my child received puberty blocking medication and hormone replacement therapy as recommended by their healthcare providers at CNH.

6. Follow-up appointments regularly included updates about my child's mental health, response to medications, on-going monitoring, and discussions about the effectiveness of the medical treatment my child was undergoing.
7. During my child's care, we trusted that the information we shared would stay strictly within CNH. I was reassured by CNH that our disclosures would remain confidential.
8. Disclosure of my child's medical records to government investigators would cause my child deep distress and intensify my anxiety and fears about their safety and well-being.
9. Information in my child's medical records is private and not available anywhere else. Disclosing it would undermine the safeguards we have carefully put in place to protect my child's future.
10. We chose CNH for its stellar reputation as a premier provider of pediatric healthcare and have always trusted that CNH would ensure the privacy of patient records.
11. Disclosure of my child's medical records to the government could cause them deep emotional harm and leave both my child and me vulnerable to the possibility of discrimination, harassment, or even unjust legal consequences.
12. Watching the government's present antagonism toward transgender people and their families only deepens my fear about my identity—and my child's—being exposed.
13. If my child's confidential medical information were shared with the government, it would represent a profound breach of trust in the healthcare system. My child would likely become fearful or unwilling to seek medical help in the future, severely affecting their access to essential care over the course of their life.
14. The release of my child's private medical information would result in significant and lasting harm.

15. Redacting our names from my child's medical records would not meaningfully protect our privacy once those records are shared with the government. Throughout my child's treatment, we provided CNH medical providers with countless sensitive details that could easily reveal our identities, including information about my child's school relationships, my occupation, our neighborhood, our family, friends, and more.
16. Revealing my name, and by extension my child's identity, in the context of litigation over safeguarding the privacy of our family's medical records, would cause my child serious emotional harm. It would also open our family up to potential harassment, bullying, and discrimination.
17. If we are not permitted to proceed under pseudonyms, we might have to withdraw this motion and abandon litigation for the safety of our child and our family.
18. For all the reasons above, I object to my child's medical records being shared with the government.
19. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

D.D.

Dated: 11/15/2025

Parent D.D.