

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

In Re. 2025 Subpoena to Children’s National
Hospital

Case No.: _____

DECLARATION OF PARENT E.E.

1. I am the parent of E.E. My child received medical care at Children’s National Hospital (“CNH”) from 2016 through some time in 2024. My child was seen by CNH physicians at both the Washington, D.C. and two Maryland CNH locations.
2. During this period, my child and I met with a range of CNH providers—physicians, nurses, mental health clinicians, and other staff. We also exchanged information with CNH through phone calls and electronic portal messages. I understand that CNH maintains comprehensive records of these visits and communications.
3. In the course of my child’s care, we provided CNH with highly personal information about my child’s physical health, emotional state, development, school life, family circumstances, friendships, and matters affecting their safety and stress levels. We shared this information for the purpose of receiving accurate medical evaluation and guidance.
4. My child also spoke with a licensed mental health provider at CNH for an assessment and follow-up. Those conversations involved sensitive subjects.
5. My child and I met with CNH physicians to discuss treatment options, the reasoning behind those options, and the risks and benefits involved. These discussions were private and central to decisions we made about my child’s care.

6. Throughout my child's treatment, we understood that the information we disclosed would remain within the CNH medical system. We relied on assurances that my child's medical records would be kept confidential and used only to provide care and coordinate services.
7. My decision to seek treatment at CNH was based on its reputation for high-quality adolescent care and its ability to handle sensitive issues responsibly. Confidentiality was an essential part of that decision.
8. I am deeply concerned by the possibility that my child's full medical records could be given to the government. These records contain intensely personal information, including the fact that my child is transgender, along with details about their physical and mental health, family life, and private experiences. I do not believe government personnel should have access to this level of detail.
9. Disclosure of these records would be harmful to my child. My child already feels vulnerable because they are transgender, and learning that government investigators or lawyers might read their medical records would cause significant emotional distress. It would also raise fears about their safety and well-being.
10. My child is hesitant to speak openly with doctors. As a parent, I worry that disclosure of my child's medical records to government officials would compound my child's hesitancy to speak candidly with clinicians, which is essential to their health.
11. My child's medical records also contain historical and identifying information that is not publicly available elsewhere. Disclosure would undermine steps our family has taken to safeguard my child's future.

12. I do not believe removing our names from the records would protect my child's identity.

Details such as age, timing of visits, school circumstances, and family structure could identify our family.

13. Allowing these records to be disclosed would break the trust on which our relationship with CNH was built. We shared sensitive information for the sole purpose of obtaining medical care, not for government review.

14. If our names were publicly linked to this case, it could identify my child and expose them to risk of harassment or discrimination. For that reason, if pseudonyms are not permitted, we would likely be forced to withdraw from this litigation to protect our child.

15. For all these reasons, I strongly object to the disclosure of my child's medical records to the government.

16. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

E.E.

Parent E.E.

Dated: 11/13/25
