

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JRR 25 MC 00709

Case No.: _____

In Re. 2025 Subpoena to Children's National
Hospital

**MOVANTS' MOTION TO QUASH
SUBPOENA DUCES TECUM**

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1. Movants, eight families who received transgender healthcare, for either themselves or their children, through Children's National Hospital's Gender Development Program from January 1, 2020 to the present, respectfully move to quash the subpoena duces tecum (Subpoena) issued by the U.S. Department of Justice (DOJ) to Children's National Hospital (CNH or Respondent) pursuant to 18 U.S.C. § 3486.
2. At least two Movants reside in Maryland and most received services from CNH in Maryland.
3. Upon information and belief, DOJ issued the Subpoena to CNH in or around June 2025. *See* Aff. of Eve Hill, Esq., in Supp. of Mot. to Quash Subpoena Duces Tecum ¶¶ 2–21.
4. Upon information and belief, the Subpoena is identical or substantially similar to the subpoenas issued to Boston Children's Hospital and Children's Hospital of Philadelphia¹ These two subpoenas are publicly available and include the same 15 requests for documents. *See* Aff. of Eve Hill ¶ 17

¹ *See In Re: Administrative Subpoena No. 25-1431-019*, 1:25-mc-91324 (D. Mass. July 8, 2025) (ECF Dkt 5-1); *In Re: Subpoena No. 25-1431-014*, 2:25-mc-00039 (E.D. Pa. July 8, 2025) (ECF Dkt. 1, Ex. F).

5. Upon information and belief, the Subpoena demands the disclosure of Movants' identities and confidential medical and family information related to their receipt of transgender healthcare, including highly sensitive records regarding diagnoses, clinical assessments, and informed consent. *See id.* These Requests violate Movants' privacy rights and seek extremely personal medical records of minors and other patients, risking nonconsensual disclosure and undermining the trust essential to the provider-patient relationship. Such disclosures could deter Movants from seeking necessary care.²

6. Further, the Subpoena appears to have been issued for an improper purpose. The current administration has publicly stated its intention to end transgender healthcare.³ *Aff. of Eve Hill* ¶¶ 3-4, 6. It has boasted that healthcare providers had paused treatment for transgender minors, achieving the "intended effect" of its efforts.⁴ The sweeping nature of these Requests appears to be for the purpose of advancing the administration's goal of singling out and harming a small group of vulnerable patients who are seeking medically necessary healthcare.⁵

7. Movants specifically seek to quash the following Requests in the Subpoena:

- a. Request 11: "Documents sufficient to identify each patient (by name, date of birth, social security number, address, and parent/guardian information) who was prescribed puberty blockers or hormone therapy."

² *See Northwestern Mem. Hosp. v. Ashcroft*, 362 F.3d 923, 929 (7th Cir. 2004).

³ Exec. Order 14187, 90 Fed. Reg. 8771 (Feb. 3, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-02-03/pdf/2025-02194.pdf>.

⁴ The White House, *President Trump Is Delivering on His Commitment to Protect Our Kids* (Feb. 3, 2025), <https://www.whitehouse.gov/articles/2025/02/president-trump-is-delivering-on-his-commitment-to-protect-our-kids/>.

⁵ *See* Amicus Br. of Massachusetts, et al., *In re Administrative Subpoena No. 25-1431-019*, No. 1:25-mc-91324 (D. Mass. Oct. 21, 2025) (ECF 39-1).

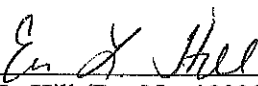
- b. Request 12: “For each such patient identified in Subpoena [Request 11],
supra, documents relating to the clinical indications, diagnoses, or
assessments that formed the basis for prescribing puberty blockers or hormone
therapy.”
- c. Request 13: “All documents relating to informed consent, patient intake, and
parent or guardian authorization for minor patients identified in [Request 11],
supra, including any disclosures about off-label use (i.e., uses not approved by
the United States Food and Drug Administration) and potential risks.”⁶
- d. All other requests (Request 1 through Request 15) to the extent such requests
or sub-requests call for the production of the identities or personal health
information of patients and their parents or guardians.

8. Movants incorporate by reference the accompanying memorandum of law and
supporting declarations.

WHEREFORE, Movants respectfully request that this Court quash the Subpoena as
requested in this motion.

Dated: November 17, 2025

Respectfully submitted,



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⁶ See *In Re: Administrative Subpoena No. 25-1431-019*, 1:25-mc-91324 (D. Mass. July 8, 2025) (Dkt 5-1); *In Re: Subpoena No. 25-1431-014*, 2:25-mc-00039 (E.D. Pa. July 8, 2025) (Dkt. 1, Ex. F).

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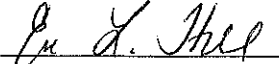
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Movants' Motion to Quash Subpoena Duces Tecum, Memorandum of Law in Support of Motion to Quash Subpoena Duces Tecum, and Proposed Order were served via first-class mail and email by agreement of the Requestor, on November 17, 2025, to Requester U.S. Department of Justice as follows:

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