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13 *motion for admission *pro hac vice* forthcoming

14 Attorneys for Plaintiffs

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
18

19 Z.A., a minor, by and through their parent,
A.A.; Z.B., a minor, by and through their
20 parent, B.B.; Z.C., a minor, by and through
their parent, C.C.; Z.D., a minor, by and
21 through their parent, D.D.; Z.E., a minor,
by and through their parent, E.E.; and F.F.,

22 Plaintiffs,

23 v.

24 LUCILE SALTER PACKARD
CHILDREN’S HOSPITAL AT
25 STANFORD, a California nonprofit public
benefit corporation,

26 Defendant.
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Case No. 5:26-cv-4998

**DECLARATION OF A.A. IN
SUPPORT OF PLAINTIFFS’ MOTION
FOR A TEMPORARY RESTRAINING
ORDER**

Trial Date: None Set

1 I, A.A., declare as follows:

2 1. I am the mother of my 17-year-old son, Z.A., who is transgender. We are
3 residents of San Mateo County, California.

4 2. My child began receiving care at Stanford in approximately 2022, and his
5 care there continues to the present. His care has included gender-related medical care. He
6 originally saw a therapist and later interacted with doctors, including an endocrinologist,
7 nurses, and a fertility specialist. In approximately 2023, he began hormone replacement
8 therapy.

9 3. The fact that my son is transgender is very private, and his Stanford
10 records contain sensitive information about his gender identity, medical care, treatment
11 decisions, and related issues.

12 4. It was hard for my son at the beginning to warm up to the providers. Privacy
13 and trust were important to his ability to participate in necessary conversations with his
14 care team and to receive appropriate medical care.

15 5. I understood that my child's medical information would be used only to
16 provide appropriate treatment and would not be disclosed beyond his care team. It never
17 occurred to me that anyone else would have access to that information.

18 6. I never consented to Stanford disclosing my child's patient-identifying
19 medical records to the government.

20 7. I was not notified by Stanford that the government was seeking patient-
21 identifying records. I only found out about the first administrative subpoena by reading
22 the news. At our next appointment, I asked my son's care team about it, but they could not
23 tell us anything.

24 8. If I had known that my child's medical records might later be requested by
25 the government, it would have affected our decisions. It was already a very
26 difficult decision to seek care in the beginning, and we might have left the country if we
27 had known my son's records could be disclosed to the federal government.

28 9. My son needed this care. This information is none of the government's

1 business, and I cannot think of any good reason for the government to have it.

2 10. I fear that the government wants to prosecute providers, and possibly
3 even parents, for seeking care that is in the best interests of transgender children. My
4 greatest fear is that the government could try to take my child away from me because I
5 supported his care.

6 11. Disclosure would affect our family's willingness to seek care and share
7 sensitive information in the future. I still trust our providers, but my trust in the hospital
8 administration has already been impaired. If Stanford turns over our information,
9 we would never go back there, and it would be incredibly difficult to find providers
10 who are as competent and whom my son would trust.

11 12. I do not believe removing names or obvious identifiers would protect my
12 child's privacy. Details such as his age, dates of care, treatment history, providers,
13 diagnosis, family circumstances, and location of care could still identify him.

14 13. I am concerned about my name or my child's name being publicly linked to
15 this case. I would not participate in this litigation if we could not use pseudonyms,
16 because my number one priority is protecting my child. If our names were public, I
17 believe our safety would be jeopardized.

18 14. For all these reasons, I strongly object to the disclosure of my child's
19 Stanford medical records to the government. We made these medical decisions with the
20 understanding that my child's medical information would be kept private and confidential.

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1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct to the best of my knowledge, and that this declaration
3 is executed this 26 day of May, 2026.

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7 A.A.

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