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13 *motion for admission *pro hac vice* forthcoming

14 Attorneys for Plaintiffs

15
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.
27
28

Case No. 5:26-cv-4998

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

Trial Date: None Set

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

2 1. I am the mother of my 17-year-old daughter, Z.B., who is transgender. We
3 are residents of San Francisco County.

4 2. My child began receiving care at Stanford in approximately 2024, and her
5 care there continued until approximately the summer of 2025. Her care included gender-
6 related medical care. She received puberty blocking injections beginning in approximately
7 2024.

8 3. My child's care at Stanford involved many providers, including an
9 endocrinologist, therapist, mental health provider, nurse practitioners, and other staff.

10 4. My child's Stanford records contain extremely sensitive and private
11 information. We had very personal conversations with Stanford providers about fertility,
12 sexuality, mental health, depression, the long-term impacts of medical treatment, and other
13 matters that my daughter would not want disclosed to anyone outside of her care team.

14 5. Privacy was essential to my daughter's ability to process what she was
15 experiencing and to speak candidly with providers. She would not have been willing to
16 speak openly with Stanford providers if she knew that information could be disclosed
17 outside the medical-care setting.

18 6. I understood that my child's medical information would be shared only with
19 other doctors and providers involved in her care.

20 7. I never consented to Stanford disclosing my child's patient-identifying
21 medical records to the government.

22 8. I was not notified by Stanford that the government was seeking patient-
23 identifying medical records.

24 9. If I had known that my child's records might later be requested by the
25 government, we would have thought much more carefully about what we said and how we
26 shared information with Stanford providers.

27 10. I am terrified by the possibility that the government could obtain my
28 daughter's records. I fear those records could be used as a weapon to harass my daughter

1 and our family. Transgender children have already been used as a political weapon by this
2 administration, and the constant barrage of hostility from the government has already
3 caused enough mental health harm.

4 11. It is terrifying to think that the government could have direct identifying
5 information about my child and our family. I worry about what the government could do
6 with that information and whether it could affect my daughter’s future at school, in
7 employment, or in other parts of her life.

8 12. I am also worried that our family could be falsely accused of child abuse
9 simply for seeking medically necessary care for our child. Even a frivolous investigation
10 or lawsuit would completely disrupt our lives and could affect our jobs and our family’s
11 stability.

12 13. Disclosure would ruin our trust in the medical system. It would make
13 transgender children and their families feel like second-class citizens who are excluded
14 from the privacy, rights, and medical care that everyone else is entitled to.

15 14. I do not believe removing names or obvious identifiers would protect my
16 child’s privacy. When families speak freely with medical providers, they disclose many
17 details that could allow the government to identify a particular child or family.

18 15. For all these reasons, I strongly object to the disclosure of my child’s
19 Stanford medical records to the government. There is no reason for the government to
20 have my daughter’s medical records except to harass us.

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

B.B.
B.B.