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

Trial Date: None Set

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

2 1. I am the parent of my 15-year-old child, Z.C., who is transgender and non-
3 binary. We are residents of Santa Clara County, California.

4 2. My child began receiving care at Stanford's gender clinic in approximately
5 2024, and their care there continues to the present. Their care has included counseling
6 with a social worker, a puberty blocker implant in approximately 2024, replacement of that
7 implant in approximately 2025, and testosterone beginning in approximately 2026.

8 3. My child's care at Stanford has involved multiple providers, including an
9 endocrinologist, a social worker, nurses, and other staff.

10 4. My child's Stanford records contain extremely sensitive and private
11 information, including information about their gender identity, medical care, treatment
12 decisions, and difficulties they were facing at school.

13 5. My child has come out to only a couple of people. They are not publicly
14 telling people that they are transgender. Privacy is critical to their ability to speak candidly
15 with providers and to make serious medical decisions.

16 6. Before my child began medical interventions, we had many conversations
17 with Stanford providers. We trusted Stanford's staff and relied on their privacy
18 protections. Without that trust and privacy, I do not know what we would have done.

19 7. I wanted to make sure my child's care would be confidential before starting
20 treatment. I understood that my child's medical information would be used for purposes of
21 medical treatment and would not be disclosed outside that context.

22 8. I never consented to Stanford disclosing my child's patient-identifying
23 medical records to the government.

24 9. I was not notified by Stanford that the government was seeking patient-
25 identifying records.

26 10. If I had known that my child's records might later be requested by the
27 government, I would have made different decisions, asked different questions, or shared
28 information differently. If I had thought these records would be disclosed, I would never

1 have sought treatment for my child at Stanford.

2 11. I am deeply concerned that the government could use my child’s records to
3 target and prosecute us as parents for seeking out medically necessary care for our child.

4 12. Disclosure would make me fear for my family’s safety. I am scared of death
5 threats, harassment of my child, and professional consequences for me, including being
6 fired from my job.

7 13. Disclosure would also affect our willingness to seek care and share sensitive
8 information in the future. If my child’s records are disclosed, I would not trust that any
9 health information is protected.

10 14. I do not believe removing names or obvious identifiers would protect my
11 child’s privacy. My child being non-binary is more unique among patients, and details in
12 the records, including information about my employment, could identify our family.

13 15. For all these reasons, I strongly object to the disclosure of my child’s
14 Stanford medical records to the government. We are not asking anything from the
15 government except to be left alone and to have the freedom to give our child
16 internationally recognized, medically necessary healthcare.

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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.



C.C.