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

Trial Date: None Set

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

2 1. I am the mother of my 10-year-old son, Z.D., who is transgender. We are  
3 residents of Monterey County, California.

4 2. My child began receiving care at Stanford in approximately 2021, and his  
5 care there continues to the present. His care began with establishing care, including a  
6 mental health evaluation, medical history, and monitoring puberty. He began a puberty  
7 blocking implant in approximately 2025.

8 3. My child's Stanford records contain very sensitive and private information,  
9 including information about his gender identity, mental health, medical history, puberty,  
10 and how his gender relates to his activities at school and his daily life.

11 4. My son prefers not to talk about the fact that he is transgender. His friends  
12 and many of the people he interacts with do not know that he is transgender.

13 5. It was important that my son felt Stanford was a safe place and that the  
14 providers were there to help him. Privacy was important to his ability to participate in  
15 care.

16 6. I understood that the information we disclosed to Stanford would be held in  
17 confidence between the doctor's office and the patient, and that it would not be available to  
18 anyone else.

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

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

23 9. If I had known that my child's records might later be requested by the  
24 government, I would have made different decisions. I might have chosen a different  
25 provider, limited the amount of information I shared, and asked more questions about how  
26 anything I shared would be kept private.

27 10. I am concerned that disclosure of my child's records could affect him as he  
28 grows older, including with documentation, jobs, and his ability to access care in the

1 future.

2 11. If my child’s medical records were disclosed and he were outed, it would  
3 totally change the way people look at him and interact with him. That would cause him  
4 serious emotional harm.

5 12. I am also afraid that the government could use our information to accuse me  
6 of doing something wrong for seeking care that I believe is best for my child.

7 13. Disclosure would make me have much less trust in the medical system. It  
8 would make it harder and more expensive to find care, and we would be much more  
9 concerned and cautious about our options.

10 14. I do not believe removing names or obvious identifiers would eliminate my  
11 concerns. I would still worry that my child and our family could be identified.

12 15. For all these reasons, I strongly object to the disclosure of my child’s  
13 Stanford medical records to the government. I want my child to have as normal a life as  
14 possible, and I do not want one medically related aspect of his identity to determine his  
15 future or his ability to do things.

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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.

D.D.