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

Trial Date: None Set

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

2 1. I am the mother of my 14-year-old son, Z.E., who is transgender. We are
3 residents of Santa Clara County, California.

4 2. My child began receiving care at Stanford in approximately 2023. His care
5 has included psychological care, care from a primary care provider based out of the gender
6 clinic, and care from a nurse practitioner.

7 3. My child received a replacement puberty blocking implant in approximately
8 2025 and also began hormone replacement therapy in approximately 2025.

9 4. My child's Stanford records contain extremely sensitive and private
10 information about his gender identity, medical care, physical development, mental health,
11 and other personal matters.

12 5. My son is not publicly out as transgender. His school, friends, and
13 community do not know that he is transgender. He is also a very private person generally.

14 6. My son really struggles with his gender dysphoria, and it is hard for him to
15 talk about. When he speaks with his psychologist, it is important for him to have
16 confidentiality and a safe space, especially as he is going through puberty, experiencing
17 changes in his body, and exploring his sexuality.

18 7. I assumed that my child's medical records would be kept extremely
19 confidential, especially given the vulnerability of this community. I expected that I would
20 be asked for permission before my son's medical records were shared beyond his
21 providers.

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 medical records might later be requested by
27 the government, I would have made different decisions. We chose Stanford because we
28 trusted Stanford and believed it was an institution that advocated for care for the LGBTQ+

1 community. I would have chosen a different provider if I had known Stanford would turn
2 my son's medical records over to this government.

3 11. I do not believe the government has any business interfering with the privacy
4 of my son's physical development process by obtaining his sensitive medical records.

5 12. Disclosure would affect both my son's physical safety and mental health. I
6 am scared for him being outed when he has not chosen to be, especially because he is
7 entering high school. His whole life would change if his medical records were disclosed.

8 13. The possibility of disclosure makes me question whether my family is safe in
9 this country and whether we need backup plans to make sure our children can still thrive
10 and succeed. It is the kind of thing that makes you wonder whether you should leave the
11 country.

12 14. I do not believe removing names or obvious identifiers would protect my
13 child's privacy. With advanced technology and the details contained in medical records, I
14 believe it would be easy to identify my son and our family.

15 15. I would not participate in this litigation without a pseudonym because my
16 son is not out, and that is his decision to make when he is ready. My son's well-being
17 depends on being able to develop as a private person.

18 16. For all these reasons, I strongly object to the disclosure of my child's
19 Stanford medical records to the government.

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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.



E.E.