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

Trial Date: None Set

1 I, F.F., declare:

2 1. I am a party in the above-entitled action. I have personal knowledge of the
3 facts set forth herein, and if called as a witness, I could and would competently so testify.

4 2. I am a 19-year-old transgender woman. I am a resident of Utrecht,
5 Netherlands.

6 3. I began receiving medical care at Stanford from 2023 until 2025.

7 4. I received hormone related medication at Stanford.

8 5. My care at Stanford involved multiple providers, including physicians,
9 mental health clinicians, and other staff.

10 6. Stanford providers know highly personal information about me. I have
11 shared information about my physical health, development, mental and emotional health,
12 gender identity, family life, safety, and other private matters with them.

13 7. Privacy has been essential to my ability to speak honestly with Stanford's
14 providers.

15 8. I provided this information to Stanford because I believed Stanford needed it
16 to give me appropriate medical care. I understood that those conversations were private
17 medical discussions and relied on them staying within the medical-care setting.

18 9. Stanford mental health providers assured me that what we shared would
19 remain confidential. That assurance mattered to me because I trusted Stanford with my
20 health in all aspects of my life.

21 10. I never consent to Stanford disclosing my patient-identifying medical records
22 to the government.

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

25 12. I did not expect that my medical records could be turned over to government
26 lawyers who are not involved in my care. The possibility that the government could obtain
27 these records is threatening and terrifying to me.

28 13. Disclosure of my records would cause severe emotional harm. It would also

1 affect my ability to trust doctors and mental health providers. If I believe that what I say in
2 medical or mental health appointments can be given to the government, I will be less
3 willing to speak candidly with the people responsible for helping me.

4 14. I do not believe redacting my name or the names of family members would
5 protect my privacy. There are not many individuals in my situation seeking this kind of
6 care, and details such as my age, location of care, timing of treatment, providers, mental
7 health history, and family circumstances could easily identify me.

8 15. I am also concerned about my name or the name of family members being
9 publicly linked to this case. I want to fight to protect my medical privacy, but I do not
10 want to unnecessarily expose my family to harm.

11 16. I would not participate in this litigation without a pseudonym because I
12 would greatly fear for the safety of myself and my family members.

13 17. For all these reasons, I strongly object to the disclosure of my Stanford
14 medical and mental health 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 23 day of May, 2026.



F.F.