

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JOEL DOE, a minor, by and through his
Guardians JOHN DOE and JANE DOE, et al.,

Plaintiffs,

v.

BOYERTOWN AREA SCHOOL DISTRICT,
et al.,

Defendants,

and

PENNSYLVANIA YOUTH CONGRESS
FOUNDATION,

Intervenor-Defendant.

Civil Action No. 17-1249-EGS

**SUPPLEMENT TO INTERVENOR-DEFENDANT PENNSYLVANIA YOUTH
CONGRESS FOUNDATION'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS
OF LAW**

As discussed at the argument held in this matter on August 11, 2017, Intervenor-Defendant Pennsylvania Youth Congress Foundation wishes to submit one additional reference for the Court's consideration in connection with Plaintiffs' motion for a preliminary injunction. It is the *Amici Curiae* Brief of School Administrators from Thirty-Three States and the District of Columbia in Support of Plaintiff-Appellant in *G.G. ex rel. Grimm v. Gloucester Cty. Sch. Bd.*, No. 15-2056 (4th Cir. 2015). The brief summarizes the experiences of schools that have allowed transgender students to use facilities that match their gender identity, as represented by over seventy individual school officials, plus ten public or charter school systems, from thirty-three states (and the District of Columbia), including Pennsylvania. *Amici Curiae* Brief of School

Administrators from Thirty-Three States and the District of Columbia in Support of Plaintiff-Appellant at 1-7, *G.G. ex rel. Grimm v. Gloucester Cty. Sch. Bd.*, No. 15-2056 (4th Cir. 2015).

Intervenor Pennsylvania Youth Congress believes that the experiences of the many schools represented in the brief are relevant to the Court's consideration of the balance of hardships and the public interest implicated by Plaintiffs' request for injunctive relief. In the words of the amici:

Amici's collective experiences refute the hypothetical concerns raised here by Defendant-Appellee Gloucester County School Board: that allowing all students to access sex-specific facilities and amenities that match their gender identity will lead to general disruption; will violate the privacy or "comfort" of other students; or will lead to the abolition of gender-segregated facilities and activities for all students. Amici have addressed and in some cases personally grappled with many of the same fears and concerns in their own schools and districts. However, in amici's professional experience, none of those fears and concerns has materialized in the form of actual problems in their schools. Instead, inclusive policies not only fully support the reality of transgender students' circumstances, but also foster a safer and more welcoming learning environment for all students.

Id. at 8.

Intervenor Pennsylvania Youth Congress respectfully urges the Court to deny Plaintiffs' motion.

Dated: August 17, 2017

Respectfully submitted,

/s/ Mary Catherine Roper

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