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The Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

**SUPPLEMENTAL DECLARATION
OF JANE DOE**

I, Jane Doe, declare as follows:

1. I am a plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. As set forth in my earlier declaration executed on September 13, 2017, I am a 29-year-old transgender woman currently serving in the U.S. military. In light of the federal government’s announced policy with respect to transgender service members, I have not come out as transgender to anyone in my chain of command, and I have not taken steps to transition to living openly as female as I had previously planned to do.

3. I am aware that the President issued a memorandum on August 25, 2017 mandating that the federal government stop providing transition-related surgical care as of March 23, 2018. This ban on surgical care contains a limited exception for situations in which surgical care is “necessary to protect the health of an individual who has already begun a course of

1 treatment to reassign his or her sex.” Because I have not yet transitioned to living openly as
2 female, I have not “begun a course of treatment to reassign [my] sex,” even assuming the other
3 conditions for the exception were satisfied.

4 4. Based on my individual circumstances, I will need surgical care as part of my
5 transition. However, I am unable to obtain that surgical care through the military because the
6 President’s policy prohibits it. Furthermore, because I have not yet begun my transition, I do not
7 qualify for the limited exception contained in the policy.

8
9 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
10 United States of America that the foregoing is true and correct.

11
12 DATED: November 7, 2017

Jane Doe

Jane Doe

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that all participants in the case are registered CM/ECF users and that service of the foregoing documents will be accomplished by the CM/ECF system on November 9, 2017.

/s/ Samantha Everett
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