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John Does 1-2, Jane Doe, and  
9 Equality California

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12  
13 AIDEN STOCKMAN; NICOLAS  
TALBOTT; TAMASYN REEVES;  
14 JAQUICE TATE; JOHN DOES 1-2;  
JANE DOE; and EQUALITY  
15 CALIFORNIA,

16 Plaintiffs,

17 v.

18 DONALD J. TRUMP, in his official  
capacity as President of the United  
19 States; JAMES N. MATTIS, in his  
official capacity as Secretary of  
20 Defense; JOSEPH F. DUNFORD, JR.,  
in his official capacity as Chairman of  
21 the Joint Chiefs of Staff; RICHARD V.  
SPENCER, in his official capacity as  
22 Secretary of the Navy; RYAN D.  
MCCARTHY, in his official capacity as  
23 Acting Secretary of the Army;  
HEATHER A. WILSON, in her official  
24 capacity as Secretary of the Air Force;  
and ELAINE C. DUKE, in her official  
25 capacity as Acting Secretary of  
Homeland Security,

26 Defendants.  
27

CASE NO. 2:17-CV-06516

**PLAINTIFFS JOHN DOES 1-2 AND  
JANE DOE'S MOTION FOR  
LEAVE TO PROCEED UNDER  
PSEUDONYMS**

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**NOTICE OF MOTION AND MOTION**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE, that Plaintiffs John Does 1-2 and Jane Doe (collectively, “Doe Plaintiffs”), through their counsel, hereby move for an Order granting them leave to proceed under pseudonyms in this matter. Doe Plaintiffs, transgender persons currently serving in the Armed Forces, assert claims against Defendant President Donald J. Trump and others stemming from President Trump’s August 25, 2017 directive (the “August 25 Directive”) to reinstate the ban “on military service by transgender individuals that was in place prior to June 2016.” Doe Plaintiffs seek to proceed under pseudonyms in this matter in order to protect their privacy and against possible retaliation.

This Motion is made based upon this Notice, the accompanying Memorandum of Points and Authorities, the accompanying Declaration of Adam S. Sieff, all other papers submitted in support of the Motion, and such other argument as may be presented to the Court.

Dated: September 5, 2017

Respectfully submitted,  
  
LATHAM & WATKINS LLP  
Amy C. Quartarolo  
Adam S. Sieff  
Harrison J. White

By /s/ Adam S. Sieff  
Adam S. Sieff

Attorneys for Plaintiffs  
Aiden Stockman, Nicolas Talbott,  
Tamasyn Reeves, Jaquice Tate,  
John Does 1-2, Jane Doe, and  
Equality California

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Plaintiffs John Does 1-2 and Jane Doe (collectively, “Doe Plaintiffs”) are transgender individuals who serve in the United States military. They bring this action against Defendants—their government and military employers, who have adopted an unlawful directive impacting their ability to continue serving their country—to vindicate their constitutional rights, including their fundamental right to privacy. Doe Plaintiffs seek anonymity to protect against retaliation by those same Defendants, to protect their privacy, and to avoid the social stigmatization and harassment often experienced by transgender people. These are precisely the “special circumstances” in which courts permit parties to proceed anonymously.

Doe Plaintiffs should not have to waive their right to privacy in order to enforce it, as well as their other constitutional rights at issue in this case. Accordingly, they respectfully request that their Motion to Proceed Under Pseudonyms (the “Motion”) be granted.

**II. ARGUMENT**

“[T]he federal courts must be safe havens for those who seek to vindicate their rights. No litigant should fear for his safety, or that of his family, as a condition of seeking justice.” *Doe ex rel. Doe v. Kamehameha Schs./Bernice Pauahi Bishop Estate*, 625 F.3d 1182, 1183 (9th Cir. 2010) (Kozinski, C.J., dissenting from denial of rehearing en banc). Accordingly, although the public has a right of access to judicial proceedings, the Ninth Circuit “permit[s] parties to proceed anonymously when special circumstances justify secrecy.” *Does I-XXIII v. Advanced Textile Corp.*, 214 F.3d 1058, 1067 (9th Cir. 2000). In *Advanced Textile*, the seminal case for proceeding under a pseudonym in the Ninth Circuit, parties are permitted to proceed under pseudonyms “when nondisclosure of the party’s identity is necessary . . . to protect a person from harassment, injury, ridicule or personal embarrassment.” *Id.* at 1067-68. Analyzing the precedent

1 followed in other circuits, the panel concluded that district courts should permit a  
2 party to proceed using a pseudonym “(1) when identification creates risk of  
3 retaliatory physical or mental harm, (2) when anonymity is necessary to preserve  
4 privacy in a matter of a sensitive and highly personal nature, and (3) when the  
5 anonymous party is compelled to admit his or her intentions to engage in illegal  
6 conduct.” *Id.* at 1068 (citations omitted).

7 Here, the circumstances more than warrant an order protecting the identities  
8 of Doe Plaintiffs.

9 **A. Doe Plaintiffs Should Be Permitted To Proceed Anonymously To**  
10 **Preserve Their Privacy And Prevent Retaliation**

11 The Ninth Circuit recognizes a need to “preserve” a plaintiff’s privacy in  
12 matters of “a sensitive and highly personal nature.” *Advanced Textile*, 214 F.3d at  
13 1068 (quotation omitted). Courts thus regularly permit plaintiffs “to proceed  
14 anonymously in cases where a substantial privacy interest is involved.” *Jane Roes*  
15 *1–2 v. SFBSC Mgmt., LLC*, 77 F. Supp. 3d 990, 994 (N.D. Cal. 2015) (citation  
16 omitted).

17 Doe Plaintiffs’ interest in controlling information related to their transgender  
18 status raises significant judicially-protected privacy interests. “The excruciatingly  
19 private and intimate nature of transsexualism<sup>1</sup>, for persons who wish to preserve  
20 privacy in the matter, is really beyond debate.” *Powell v. Schriver*, 175 F.3d 107,  
21 111 (2d Cir. 1999) (holding that “the Constitution does indeed protect the right to

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22  
23 <sup>1</sup> “Transsexualism” is an older term that originated in the medical and  
24 psychological communities, and it appears throughout the Federal Reports.  
25 Although preferred by some people who have permanently changed their bodies  
26 through hormone treatment or surgeries, unlike “transgender,” “transsexual” is no  
27 longer considered an umbrella term. Many transgender people today do not  
28 identify as transsexual and prefer the word transgender. For clarity, Plaintiffs will  
not alter references to transsexualism where it is used synonymously with  
transgenderism. *See generally* “GLAAD Media Reference Guide,” *accessible at*  
<https://www.glaad.org/reference/transgender>.

1 maintain the confidentiality of one’s transsexualism”) (citing cases). As the  
2 Second Circuit concluded, because transgender people “understandably might  
3 desire to conduct their affairs as if such a transition was never necessary,” their  
4 “interest in privacy . . . is particularly compelling.” *Id.* at 111; *see also Doe v. Blue*  
5 *Cross & Blue Shield of Rhode Island*, 794 F. Supp. 72, 74 (D.R.I. 1992) (“As a  
6 transsexual, plaintiff’s privacy interest is both precious and fragile, and this Court  
7 will not cavalierly permit its invasion.”).

8         Although Doe Plaintiffs may have come out as transgender people to  
9 friends, family members, and even to fellow servicemembers, they have not  
10 necessarily broadcast their gender identity to the public. (*See* Decl. of Adam S.  
11 Sieff in Supp. of Doe Pls.’ Mot. for Leave to Proceed Under Pseudonyms (“Sieff  
12 Decl.”), ¶¶ 2-4.) They do not wish to do so now. Public identification as a  
13 transgender person could lead to harassment. (*See* Sieff Decl., Ex. A-D (media  
14 reports documenting animus toward transgender people who serve in the military  
15 and transgender people generally).) The potential for such harassment would be  
16 particularly acute here, because Doe Plaintiffs would become public faces of a  
17 controversy drawing national attention. (*See id.*) Doe Plaintiffs should not have to  
18 suffer persecution and compromise their privacy in order to vindicate their legal  
19 right to the same.

20         Additionally, leave for Doe Plaintiffs to proceed under pseudonyms is  
21 independently justified by the need to avoid or minimize the possibility of  
22 retaliation against them. In *Advanced Textile*, the Ninth Circuit devised a five-  
23 factor test that applies to plaintiffs who wish to proceed under a pseudonym  
24 specifically because of a fear of retaliatory harm: (1) the severity of the threatened  
25 harm, (2) the reasonableness of the anonymous party’s fears, (3) the anonymous  
26 party’s vulnerability to such retaliation, (4) the prejudice to the opposing party and  
27 the ability to mitigate that prejudice, and (5) whether the public interest is served

28 ///

1 by requiring the party to reveal his or her identity. *See Advanced Textile*, 214 F.3d  
2 at 1068–69.

3 In *Advanced Textile*, the court allowed garment worker plaintiffs who  
4 asserted claims under the Fair Labor Standards Act against their employer to  
5 proceed under fictitious names. *Id.* at 1070-73. The court held that the plaintiffs  
6 satisfied the five-factor test because: (1) plaintiffs risked “economic injury” by  
7 revealing themselves, including “termination and blacklisting,” (2) plaintiffs were  
8 actually threatened with such termination and blacklisting, (3) plaintiffs were  
9 subordinate to defendants, who could terminate them at will, (4) plaintiffs did not  
10 prejudice defendants by withholding their identities where no discovery was  
11 needed from plaintiffs, at least not at that stage of the litigation, and (5) the public  
12 had no interest in knowing the identities of the individuals bringing suit, but did  
13 have “an interest in seeing this case decided on the merits,” such that “permitting  
14 plaintiffs to use pseudonyms [served] the public’s interest in this lawsuit by  
15 enabling it to go forward.” *Id.*

16 Insofar as Doe Plaintiffs, each an active servicemember, are at risk of  
17 retaliation in connection with their employment, they are similarly situated to the  
18 *Advanced Textile* plaintiffs. With respect to the first two factors, Doe Plaintiffs  
19 risk reprimand or other adverse consequences, including termination, by coming  
20 forward, as President Trump has instructed the Defendants to implement a plan to  
21 return to the prohibition on military service for transgender people. (*See Mem.*  
22 *Re: Military Service by Transgender Individuals*, -- Fed. Reg. ----- (entered Aug.  
23 25, 2017) (publication forthcoming)).

24 On the third factor, Doe Plaintiffs are soldiers in the chain of command  
25 subject to the orders of superior officers who have been directed to implement a  
26 plan removing them from service. Identifying themselves publically as parties to  
27 this lawsuit could single-out Doe Plaintiffs for termination “by calling attention to  
28 [their] small number.” *Advanced Textile*, 214 F.3d at 1072.

1 As to the fourth factor, because this is a facial challenge to the  
2 constitutionality of Defendants' August 25 Directive predominated by questions of  
3 law, no discovery from Doe Plaintiffs is necessary, and Defendants are not  
4 prejudiced by their anonymity.

5 And finally, concerning the fifth factor, the public interest is not served by  
6 requiring Doe Plaintiffs to disclose their identities. The public has a compelling  
7 "interest in seeing this case decided," and "permitting plaintiffs to use pseudonyms  
8 will serve the public's interest in this lawsuit by enabling it to go forward."  
9 *Advanced Textile*, 214 F.3d at 1073; *see also EW v. New York Blood Ctr.*, 213  
10 F.R.D. 108, 112 (E.D.N.Y. 2003) (explaining that "personal anonymity is more  
11 readily granted" in cases "involving a government defendant . . . because of the  
12 existence of a public interest in the action"); *see also Melendres v. Arpaio*, 695  
13 F.3d 990, 1002 (9th Cir. 2012) (it is "always in the public interest to prevent the  
14 violation of a party's constitutional rights").

15 Perhaps even more to the point, transgender people serving in the military  
16 already are attracting hostile attention as a result of the August 25 Directive's  
17 politicization of their service. (*See* Sieff Decl. Ex. A-C.) Were Doe Plaintiffs to  
18 be publicly identifiable, they could well be made examples of in the media, or  
19 harassed in their private lives, simply because they dared to enforce their  
20 constitutional rights.

21 The protection of Doe Plaintiffs' identities thus is warranted to protect their  
22 privacy, as well as on account of their credible fear of retaliation and harassment.

23 **B. Defendants Will Suffer No Prejudice By Allowing Plaintiff To**  
24 **Proceed Pseudonymously**

25 Defendants are not prejudiced by Doe Plaintiffs' anonymity. This is a facial  
26 challenge to Defendants' unconstitutional August 25 Directive seeking to exclude  
27 transgender people from serving in or acceding into the military, and to preclude  
28 transgender servicemembers from equal access to full medical care. No discovery

1 from Doe Plaintiffs is necessary to consider and decide their legal claims. Even if  
2 Defendants at some later point present good cause to force Doe Plaintiffs to  
3 disclose themselves in some limited fashion,<sup>2</sup> there simply is no basis to require  
4 Doe Plaintiffs to identify themselves to Defendants, or the public, at this time.  
5 *Advanced Textile*, 214 F.3d at 1072 (no prejudice to defendant from plaintiffs’  
6 pseudonyms where defendant could not identify any specific damage to it at  
7 present stage of proceedings); e.g., *Publius v. Boyer-Vine*, No. 1:16-cv-1152-LJO-  
8 SKO, 2017 WL 1881463, at \*5 (E.D. Cal. May 9, 2017) (permitting plaintiff to  
9 remain anonymous in action where disclosure not yet necessary to mount a  
10 defense).

11 **III. CONCLUSION**

12 For the foregoing reasons, Doe Plaintiffs respectfully request that their  
13 Motion be granted and that the Court enter an order permitting them to proceed  
14 under pseudonyms in connection with this action.

15  
16 Dated: September 5, 2017

Respectfully submitted,  
LATHAM & WATKINS LLP  
Amy C. Quartarolo  
Adam S. Sieff  
Harrison J. White

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20 By /s/ Adam S. Sieff  
Adam S. Sieff

21 Attorneys for Plaintiffs  
22 Aiden Stockman, Nicolas Talbott,  
23 Tamasyn Reeves, Jaquice Tate,  
24 John Does 1-2, Jane Doe, and  
Equality California

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27 <sup>2</sup> Doe Plaintiffs expressly reserve the right to seek a protective order to the  
28 extent they are made to later identify personal information beyond that asserted in  
their Complaint.

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10 UNITED STATES DISTRICT COURT  
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14 JAQUICE TATE; JOHN DOES 1-2;  
JANE DOE; and EQUALITY  
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17 v.

18 DONALD J. TRUMP, in his official  
capacity as President of the United  
19 States; JAMES N. MATTIS, in his  
official capacity as Secretary of  
20 Defense; JOSEPH F. DUNFORD, JR.,  
in his official capacity as Chairman of  
21 the Joint Chiefs of Staff; RICHARD V.  
SPENCER, in his official capacity as  
22 Secretary of the Navy; RYAN D.  
MCCARTHY, in his official capacity as  
23 Acting Secretary of the Army;  
HEATHER A. WILSON, in her official  
24 capacity as Secretary of the Air Force;  
and ELAINE C. DUKE, in her official  
25 capacity as Acting Secretary of  
Homeland Security,

26 Defendants.  
27  
28

CASE NO. 2:17-CV-06516

**DECLARATION OF ADAM S.  
SIEFF IN SUPPORT OF  
PLAINTIFFS JOHN DOES 1-2 AND  
JANE DOE'S MOTION FOR  
LEAVE TO PROCEED UNDER  
PSEUDONYMS**

1 I, Adam Sieff, declare as follows:

2 1. I am an attorney at Latham & Watkins LLP licensed to practice law in  
3 the State of California. I am counsel of record for Plaintiffs John Does 1-2 and  
4 Jane Doe (collectively, “Doe Plaintiffs”) in this litigation. I have personal  
5 knowledge of the facts set forth in this declaration and if called as a witness, could  
6 and would testify competently thereto.

7 2. Doe Plaintiffs are transgender persons serving in the United States  
8 Armed Forces. Each has experienced harassment and hostility because of their  
9 status as transgender persons.

10 3. Each Doe Plaintiff has identified as transgender to some of her or his  
11 friends, family members and fellow servicemembers. Doe Plaintiffs have not  
12 shared their status as transgender soldiers with the national public.

13 4. In reliance on the 2016 policy change that allowed transgender service  
14 members to serve openly, several Doe Plaintiffs came out as transgender to her or  
15 his chain of command.

16 5. Each of the three Doe Plaintiffs fear retaliation, including the  
17 possibility of termination, for her or his participation in this lawsuit.

18 6. Attached hereto as **Exhibit A** is a true and correct copy Delingpole,  
19 “Trump’s Transgender Military Ban Is the Best Thing Ever,” Breitbart, *available at*  
20 [http://www.breitbart.com/big-government/2017/07/27/delingpole-trumps-](http://www.breitbart.com/big-government/2017/07/27/delingpole-trumps-transgender-military-ban-is-the-best-thing-ever/)  
21 [transgender-military-ban-is-the-best-thing-ever/](http://www.breitbart.com/big-government/2017/07/27/delingpole-trumps-transgender-military-ban-is-the-best-thing-ever/).

22 7. Attached hereto as **Exhibit B** is a true and correct copy of Washo,  
23 “Right-wing media and hate groups applaud Trump for banning transgender people  
24 from serving in the US armed forces,” Media Matters, *available at*  
25 [https://www.mediamatters.org/research/2017/07/26/right-wing-media-and-hate-](https://www.mediamatters.org/research/2017/07/26/right-wing-media-and-hate-groups-applaud-trump-banning-transgender-people-serving-us-armed-forces/217395)  
26 [groups-applaud-trump-banning-transgender-people-serving-us-armed-](https://www.mediamatters.org/research/2017/07/26/right-wing-media-and-hate-groups-applaud-trump-banning-transgender-people-serving-us-armed-forces/217395)  
27 [forces/217395](https://www.mediamatters.org/research/2017/07/26/right-wing-media-and-hate-groups-applaud-trump-banning-transgender-people-serving-us-armed-forces/217395).

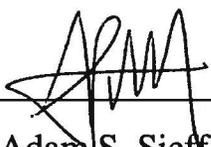
28 8. Attached hereto as **Exhibit C** is a true and correct copy of Porter,

1 “Transgender Military Ban: The Rise of Anti-LGBT Hate Groups in Trump’s  
2 White House,” Newsweek, *available at* [http://www.newsweek.com/anti-lgbt-hate-  
4 groups-transgender-military-ban-trump-642218](http://www.newsweek.com/anti-lgbt-hate-<br/>3 groups-transgender-military-ban-trump-642218).

4 9. Attached hereto as **Exhibit D** is a true and correct copy of Herzog,  
5 “Breitbart writer targets transgender UWM Student” Milwaukee Journal Sentinel,  
6 *available at* [http://www.jsonline.com/story/news/education/2016/12/14/breitbart-  
8 writer-targets-transgender-uwm-student/95420206/](http://www.jsonline.com/story/news/education/2016/12/14/breitbart-<br/>7 writer-targets-transgender-uwm-student/95420206/).

8 I declare under penalty of perjury under the laws of the United States of  
9 America that the foregoing is true and correct. Executed September 5, 2017 in Los  
10 Angeles, CA.

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Adam S. Sieff

# **EXHIBIT A**

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# DELINGPOLE: TRUMP'S TRANSGENDER MILITARY BAN IS THE BEST THING EVER (\*)

1341

17



Justin Sullivan/Getty

by JAMES DELINGPOLE | 27 Jul 2017 | 2,360

## TRUMP'S NEXT MOVE?

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(\*) *Apart from all the other best things ever he has done so far...*

Just like *The Simpsons* in the days when it was good, Trump's ban on transgenderism in the military is great because it works on so many levels.

**It's great** because it trolls like a boss.



**Not Elizabeth**  
@NotElizabeth88

Follow

Trump: I bet I can get liberals to defend joining the army.  
Mattis: No way.  
Trump: Hold my beer while I tweet.

4:37 AM - Jul 27, 2017

169 2,073 3,802

**It's great** because [it has annoyed so many of the right people:](#)



**George Takei**  
@GeorgeTakei

Follow

Donald: With your ban on trans people from the military, you are on notice that you just pissed off the wrong community. You will regret it.

6:40 AM - Jul 26, 2017

2,935 10,547 38,948

(Never underestimate the importance of this. Every time President Trump annoys people like George Takei, he is sending out a subtle signal to the base: #winning)

**It's great** because of the very sensible reasons the great Thomas Wictor advances in this typically astute Twitter thread:



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4Patriots

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HeraldWeekly

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by Taboola



California Residents: Officials Urge You To Carry This At All Times

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**▶ TAKE A LOOK**

- **No Viagra Needed When You Do**

As Victor explains, “transgendered people have become political props used by angry leftists attempting to destroy everything they oppose.” They were also about to [cost the U.S. taxpayer heinous amounts of money](#) – perhaps \$8.4 million a year – because, [thanks to legislation introduced last year by President Obama](#), the Defense Department was liable for the cost of the gender reassignment surgery on any soldier whose ability to serve was “adversely affected by a medical condition or medical treatment related to their gender identity.”



Not only were these transgender sensitivity policies burdening the military with unnecessary costs but they were also making it less effective. Victor: “Talk to people who served in 2016. They’ll tell you that they spent a huge amount of time in sensitivity training seminars.”

Sensitivity training? In the military? This is not how wars are won.

As my ex-Special Forces buddy Mike Simpson (check out our [recent podcast](#)) puts it:

Twitter thread showing Donald J. Trump's tweets and Mike Simpson's reply. Trump's tweets discuss military costs and transgender individuals. Simpson's reply states it's a "concentrate-on-winning-wars-on-the-battlefield-cause-that's-what-militaries-do" decision.

Amen, bro.

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WHO REPRESENTS HIM?

**But maybe the most important reason of all why it's great is this:** President Trump just did – again – what literally no other leader in the world is doing right now. He took a step towards saving Western Civilization.

I wish this were an exaggeration. I wish Western Civilization were so secure that it was quite beyond the power of the U.S. president or anyone else to shake or shore up its foundations.

The fact is, though, that Western Civilization is in the direst of trouble. We're talking Last Days of the Roman Empire here. One of the reasons we know that Western Civilization is on its last legs is because of precisely the kind of cultural and intellectual decadence that gave us Obama's rules on transgenders in the military, and which is also responsible for all that shrieking we're hearing from liberals now about what a terrible thing Trump did to repeal that legislation.

No Trump did not do a terrible thing. He did the right thing. He did the only possible thing for anyone who still believes in truth, justice, social order, commonsense, decency, logic – and all the other values which have traditionally underpinned our culture and made us great.

What he just did, among other things, is reaffirm first principles.

Let's consider the issue for a moment in its simplest terms: why do we have a military?

The military exists for the defence of the realm. That's why people are happy to pay for it in the form of taxation: not because uniforms are spiffy or because guns are cool or because every girl loves a soldier (though of course all those things are true) but in order that they can sleep safely in their beds at night confident that they are being protected from their nation's enemies.

Any other purpose that has been introduced into the military over the years is mission creep – often self-destructive mission creep. For example, the military is not there to help Muslims feel more "included" (Fort Hood, anyone?); nor to solve climate change; nor to help feminists pretend that girls are just as strong and tough as men; nor, yet, to give people who are confused about their sex or "gender" a lovely warm glow of recognition and belongingness.

Nice, fluffy and cute though some of these goals may be, they should not be the concern of the military. The fact that in recent years they have become the concern of the military speaks volumes about the grip which the Cultural Marxists – the Social Justice Warriors as they are currently known – have on our culture. Really you might have hoped that the one institution which would have remained immune to SJW nonsense would have been the one whose main concern is training young men up to a peak of fitness, aggression and killing efficiency in order that they can wipe out the nation's enemies. But nope: even the Helm's Deep that was the U.S. military fell to the SJW hordes long ago.

What President Trump has just done is taken a vital first step towards reclaiming it for the forces of civilization.

And this matters, it really does. Compare and contrast Trump's fearless rejection of the transgender movement's political agenda with the recent announcement by the UK Government's Equalities Minister (!) Justine Greening that in future people in Britain should be free to decide their own "gender" regardless of medical opinion or what it says on their birth certificate.

As I argue in more detail [here](#) Greening's move is the final nail in the coffin of the Conservative party in Britain. In the guise of "moving with the times" and "reaching out to the young" and "making marginalised minorities feel more comfortable in their skin" what it is in fact doing is rejecting one of the most basic tenets of Western Civilization. Indeed, it's a flat out rejection of reality.

KRISTIAN NIEMITZ

GUN RIGHTS GROUPS PURSUE  
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There are, needless to say, lots of other practical reasons why allowing people legally to decide their own gender is a terrible idea: the destructive effect on women's sport; the constraints it will inevitably place on the freedom of speech of the many of us who, quite rightly, think this is an SJW bridge too far; the mind-warping effects it's going to have on the impressionable children who no doubt are going to be exposed to this post-modern guff as part of their 'education'.

But the worst thing of all, as far as I can see, is that it capriciously, irresponsibly and unnecessarily rejects one of the most basic truths of nature: that there are men and there are women; that we are identifiably different. For me this is one of those pivotal moments in the decline of western civilisation. The barbarians are at the gate and here's Justine Greening pushing the doors wide open: 'C'mon in guys, gals —or however you want to define yourselves! The city is all yours. Or is that zirs?'

When socialist governments introduce legislation like that, you tend to roll your eyes, shrug your shoulders and mutter to yourself: "Well at least a conservative government will be along shortly to clean up the mess, as they always do." But when this planned legislation comes from your own team – a notionally conservative government – then you know it's game over. This, I know, is a problem right now which is exasperating conservatives not just in Britain but in pretty much all the western countries in the world that aren't the United States.

What Donald Trump is doing right now is that good, that important. He has his work cut out, not just because he has so many enemies in the mainstream media, on the left generally, as well as within the GOP, but because his predecessors – Obama especially – made sure to salt the earth and poison the wells before he came into the White House.

But the size of the obstacles facing him just make the scale of what he has achieved and what he will achieve even more impressive.

President Trump isn't, as the liberals would have us believe, picking on innocent transgender people. He is simply defending the values that have made us great and which, if he succeeds – as, pray God, he must – will make us great again.

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# **EXHIBIT B**



Published on *Media Matters for America* (<https://www.mediamatters.org>)

Home > Right-wing media and hate groups applaud Trump for banning transgender people from serving in the US armed forces

# Right-wing media and hate groups applaud Trump for banning transgender people from serving in the US armed forces

Conservative media outlets and personalities, along with anti-LGBTQ hate groups, applauded President Donald Trump's Twitter announcement that he will be banning transgender people from serving in the U.S. armed forces because the military "cannot be burdened with the tremendous medical costs and disruption that transgender in the military would entail."



Sarah Wasko / Media Matters

## Trump bans transgender people from serving in the military

**Wash. Post:** “President Trump said he will ban transgender people from serving in the military in any capacity, a reversal of the Obama administration decision that would have allowed them to serve.”

*The Washington Post* reported, “President Trump said he will ban transgender people from serving in the military in any capacity.” Trump tweeted on July 26 that “the United States Government will not accept or allow Transgender individuals to serve in any capacity in the U.S. military” because it “cannot be burdened with the tremendous medical costs and disruption that transgender in the military would entail.” From the July 26 article:

President Trump said he will ban transgender people from serving in the military in any capacity, a reversal of the Obama administration decision that would have allowed them to serve, he announced on social media on Wednesday.

Citing the need to focus on victory, Trump said that the military cannot accept the burden of higher medical costs and “disruption” that transgender troops would require.

“After consultation with my Generals and military experts, please be advised that the United States Government will not accept or allow transgender individuals to serve in any capacity in the U.S. Military,” Trump wrote on Twitter. “Our military must be focused on decisive and overwhelming victory and cannot be burdened with the tremendous medical costs and disruption that transgender in the military would entail.” [*The Washington Post*, 7/26/17 <sup>[1]</sup>; Twitter, 7/26/17 <sup>[2]</sup>, 7/26/17 <sup>[3]</sup>, 7/26/17 <sup>[4]</sup>]

## Conservative media lauded the decision as “bold” and a “YUGE Relief”

**The Right Scoop:** Trump’s decision to ban transgender people from serving in the military is “the right decision” and a “YUGE relief.” “Conservative news blog The Right Scoop said the decision to ban transgender people from serving in the military “is a YUGE relief”:

After what Trump said on the campaign trail last year about transgenders, this is a YUGE relief.

I'll give him credit for making the right decision here, a decision that the leftist media will no doubt pound him for over the next four years. [The Right Scoop, 7/26/17 <sup>[5]</sup>]

**The Resurgent's Josh Hammer:**

The media will absolutely freak out at Trump's military/transgender announcement. I bet the public backs it 75-25, at minimum.

— Josh Hammer (@josh\_hammer) July 26, 2017 <sup>[6]</sup>

[Twitter, 7/26/17 <sup>[6]</sup>]

**The Daily Wire's Ben Shapiro:**

1. The military should not accept mentally ill soldiers.
2. This should not devalue the heroism of those who want to serve. (/1)

— Ben Shapiro (@benshapiro) July 26, 2017 <sup>[7]</sup>

[Twitter, 7/26/17] <sup>[7]</sup>

**Gateway Pundit: "Not one individual" opposing Trump's decision "provided any study or report supporting the idea that transgenders serving" in the military contribute "to its overall success."** Far-right fringe news blog The Gateway Pundit defended Trump's decision, claiming that liberals did not provide "any study or report supporting the idea that transgenders serving in the armed forces contributes (sic) to its overall success." From the July 26 article:

Following the news of President Trump banning transgenders from serving in the United States military, liberals took to Twitter to lash out at the announcement.

You'll notice not one individual provided any study or report supporting the idea that transgenders serving in the armed forces contributes (sic) to its overall success. [The Gateway Pundit, 7/26/17 <sup>[8]</sup>]

**Breitbart's Joel Pollak:**

Trump's ban on transgenders in military is a bold statement that purpose of armed forces remains killing the enemy & not social engineering.

<https://t.co/SqjE1TTME1> <sup>[9]</sup>

— Joel B. Pollak (@joelpollak) July 26, 2017 <sup>[10]</sup>

[Twitter, 7/26/17 <sup>[10]</sup>

**Hot Air: “The duty of the the armed forces is to defend the nation ... not train soldiers to shower with ‘women who have male genitalia.’”** Conservative news blog Hot Air defended Trump’s decision to ban transgender people from serving in the military claiming, “The duty of the the armed forces is to defend the nation and maintain readiness at maximum efficiency, not train soldiers to shower with ‘women who have male genitalia.’” From the July 26 post:

The best argument for the policy change back to the traditional model is the one that Trump offered on Twitter. The duty of the the armed forces is to defend the nation and maintain readiness at maximum efficiency, not train soldiers to shower with “women who have male genitalia.” The counterargument is that the ban will keep talented recruits from making the service as good or better than it already is, but the additional medical costs and complications for their transgender status argues against efficiency, at least. That’s very different from having gays and lesbians serve openly, as the only difference between them and other recruits is sexual orientation, not medical issues. [Hot Air, 7/26/17 <sup>[11]</sup>

**Conservative radio host Steve Deace:**

Absolutely @realDonaldTrump <sup>[12]</sup> is correct -- military is for killing people and breaking things, not regressive Leftist social engineering.

— Steve Deace (@SteveDeaceShow) July 26, 2017 <sup>[13]</sup>

[Twitter, 7/26/17 <sup>[13]</sup>

**Alt-Right.com’s Richard Spencer:**

Wait, so Trump doesn't want to march transsexual armies on Moscow and crush gender-binary fascism!?

So un-American! #Resist <sup>[14]</sup>

— Richard Spencer (@RichardBSpencer) July 26, 2017 <sup>[15]</sup>

[Twitter, 7/26/17 <sup>[15]</sup>

**Conservative radio host and former Ku Klux Klan leader David Duke:**

Finally, some sanity. [pic.twitter.com/dU1mQO1zsg](https://pic.twitter.com/dU1mQO1zsg) <sup>[16]</sup>

— David Duke (@DrDavidDuke) July 26, 2017 <sup>[17]</sup>

[Twitter, 7/26/17 <sup>[17]</sup>

## Anti-LGBTQ hate groups also applauded the decision

**Family Research Council's Tony Perkins:** “The last thing we should be doing is diverting billions of dollars from mission-critical training to something as controversial as gender reassignment surgery.” Tony Perkins, president of the anti-LGBTQ hate group Family Research Council and a frequent Fox News guest, issued a statement praising Trump for “keeping his promise to return to military priorities – and not continue the social experimentation of the Obama era that has crippled our nation’s military.” He also professed, “The last thing we should be doing is diverting billions of dollars from mission-critical training to something as controversial as gender reassignment surgery.” From the July 26 statement:

“I applaud President Trump for keeping his promise to return to military priorities – and not continue the social experimentation of the Obama era that has crippled our nation’s military. The military can now focus its efforts on preparing to fight and win wars rather than being used to advance the Obama social agenda.

“President Trump recognizes what the nation’s military leadership and the American people realize, this Obama policy makes no sense.

“The last thing we should be doing is diverting billions of dollars from mission-critical training to something as controversial as gender reassignment surgery. However, the cost to readiness, recruitment, retention, morale and cohesion would have been even greater under the Obama policy. As our nation faces serious national security threats, our troops shouldn’t be forced to endure hours of transgender ‘sensitivity’ classes and politically-correct distractions like this one. [Family Research Council, 7/26/17 <sup>[18]</sup>]

**American Family Association: “AFA applauds President Trump for his courageous decision to end the usage of our military for social engineering and political correctness.”** Tim Wildmon, president of the anti-LGBTQ hate group American Family Association, issued a statement on Facebook praising Trump for “his courageous decision to end the usage of our military for social engineering and political correctness.” From the July 26 post:

This morning President Donald Trump released a statement on Twitter which said, "After consultation with my Generals and military experts, please be advised that the United States Government will not accept or allow transgender individuals to serve in any capacity in the U.S. Military. Our military must be focused on decisive and overwhelming victory and cannot be burdened with the tremendous medical costs and disruption that transgender in the military would entail."

The American Family Association has been highly critical of the transgender military policy of President Obama’s administration. AFA applauds President Trump for his courageous decision to end the usage of our military for social engineering and political correctness. American families deserve a military that is focused solely on readiness and national defense. [Facebook, 7/26/17 <sup>[19]</sup>]

**Anti-LGBTQ hate group National Organization for Marriage:**

Big thank you to President @realDonaldTrump [12] for overturning Obama's gender ideology nonsense in the military!

— NOM (@NOMupdate) July 26, 2017 [20]

[Twitter, 7/26/17 [20]]

**Anti-LGBTQ hate group ProFam:**

Big thank you to President @realDonaldTrump [12] for overturning Obama's gender ideology nonsense in the military!

— ProFam\_org (@ProFam\_Org) July 26, 2017 [21]

[Twitter, 7/26/17 [21]]

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**Links**

[1] [https://www.washingtonpost.com/news/post-politics/wp/2017/07/26/trump-announces-ban-on-transgender-people-in-u-s-military/?utm\\_term=.80fca91dc539](https://www.washingtonpost.com/news/post-politics/wp/2017/07/26/trump-announces-ban-on-transgender-people-in-u-s-military/?utm_term=.80fca91dc539)

[2] <https://twitter.com/realDonaldTrump/status/890193981585444864>

[3] <https://twitter.com/realDonaldTrump/status/890196164313833472>

[4] <https://twitter.com/realDonaldTrump/status/890197095151546369>

[5] <http://therightscoop.com/breaking-trump-announces-no-transgenders-to-be-allowed-in-the-military/>

[6] [https://twitter.com/josh\\_hammer/status/890205126404833280](https://twitter.com/josh_hammer/status/890205126404833280)

[7] <https://twitter.com/benshapiro/status/890206362143256577>

[8] <http://www.thegatewaypundit.com/2017/07/liberals-freak-transgenders-banned-serving-u-s-military/>

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[10] <https://twitter.com/joelpollak/status/890200823765979136>

[11] <http://hotair.com/archives/2017/07/26/trump-no-transgenders-capacity-us-military/>

[12] <https://twitter.com/realDonaldTrump>

[13] <https://twitter.com/SteveDeaceShow/status/890203719173894144>

[14] <https://twitter.com/hashtag/Resist?src=hash>

- [15] <https://twitter.com/RichardBSpencer/status/890213491591725059>
- [16] <https://t.co/dU1mQO1zsg>
- [17] <https://twitter.com/DrDavidDuke/status/890214450975866880>
- [18] <http://www.frc.org/newsroom/family-research-council-praises-president-trumps-decision-to-focus-on-military-priorities-over-obama-era-transgender-policy>
- [19] <https://www.facebook.com/AMERICANFAMASSC/posts/10155389041812860>
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- [32] <https://www.mediamatters.org/shows-and-publications/hot-air>
- [33] <https://www.mediamatters.org/stories-and-interests/transgender-rights>

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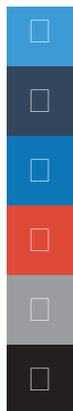
## TRANSGENDER MILITARY BAN: THE RISE OF ANTI-LGBT HATE GROUPS IN TRUMP'S WHITE HOUSE

BY **TOM PORTER** ON 7/26/17 AT 12:47 PM



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## U.S.

In June, a legislative landmark in the struggle for LGBT equality in America stalled, just hours before it was due to be implemented, when Defense Secretary James Mattis halted an Obama-era bill allowing transgender people to serve in the military.

On Wednesday, President Donald Trump tweeted that not only would transgender people be barred from enlisting, but they would be barred from serving “in any capacity.”

Trump cited the “tremendous medical costs and disruption” he claimed transgender service personnel would entail as grounds for the move.

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But civil rights campaigners argue the move shows the growing influence in Trump's America of organizations that have been labeled anti-LGBT hate groups, and which fiercely lobbied against the transgender bill.





Tony Perkins, president of the Family Research Council, speaking at the Justice Sunday III rally, January 8, 2006, in Philadelphia.

GETTY

### **America's anti-LGBT hate groups**

With their roots in the Christian right and contacts deep inside Trump's White House, myriad groups claiming to stand for American family values have for decades fought to roll back LGBT rights in America.

“These are all having a pretty successful run right now with the Trump administration,” Heidi Beirich, a researcher at the Southern Poverty Law Center (SPLC) told *Newsweek*. “I think the military suspending transgender [people] from the military shows the influence of the religious right.”

Even before the transgender ban, moves by the Trump administration sparked concern among civil rights campaigners.

Earlier in July, Attorney General Jeff Sessions held a meeting behind closed doors with the Alliance Defending Freedom (ADF), which has characterized homosexuality as a “degradation of our human dignity” and falsely linked it to pedophilia. Sessions has refused to discuss the content of the talks.

“ADF is the most extreme anti-gay legal organization—so extreme that it does not concede even that gay or transgender people should be permitted to exist as such,” Shannon Minter of the National Center for Lesbian Rights told CNN.

The previous month, Vice President Mike Pence pledged his unwavering support for Focus on the Family, another anti-LGBT group, whose founder, James Dobson, has blamed the 2012 Sandy Hook shooting on the growing acceptance of LGBT rights in America.

And, departing from a precedent set by Obama, the White House did not acknowledge June as LGBT pride month.

The SPLC has identified 45 organizations it classifies as anti-LGBT hate groups spread across the country, dedicated to waging what Focus on the Family founder Dobson described as a “second civil war” to put control of the U.S. government in the right hands—the hands of those who reject LGBT rights.



Then Republican presidential candidate Donald Trump addresses the Values Voter Summit at the Omni Shoreham, in Washington, D.C., September 9, 2016. Conservative anti-LGBT groups claim their influence is growing in the White House.

GETTY

### Family Research Council

Central to the lobbying campaign to ban transgender people in the military has been the Family Research Council (FRC), one of the largest and most influential anti-LGBT groups in the U.S., and which describes itself as “the leading voice for the family in our nation’s halls of power.” For decades, the group has smeared homosexuals in its publications, insinuating that gay people are more likely to sexually abuse children.

The group boasts Vice President Pence as a supporter, as well as Ken Blackwell, who led Trump’s domestic transition team as a current staff member.

In September, Trump addressed the Values Voter Summit, which was hosted by the FRC, in Washington, D.C.

Peter Sprigg, senior fellow for policy studies at the FRC, boasted of the group’s connections to the

Trump administration in an interview with *Newsweek* just weeks before Trump's transgender ban.

"We have relationships with a number of people within the Trump administration, in various departments, and Tony Perkins, the FRC President, has met and knows Donald Trump as well," he said.

"I can't go into any more detail than that, other than we have big communications channels with the Trump administration," he said.

The FRC emerged from a 1980 Washington, D.C., prayer meeting between leaders of the religious right, and in the 1990s went on to extend its influence across the United States, building a national network of "concerned citizens" and taking its lobbying operations into the heart of Washington, D.C.

Its researchers frequently appear in the media in a bid to shape public debate, and in its publications the group cites a variety of sources, including scientific studies, to justify its anti-LGBT views.

Lawyer and civil rights campaigner John Aravosis has analyzed FRC research papers, and believes the group cherry-picks and distorts evidence as part of a deliberate campaign to smear the LGBT community.

In a blog posting he wrote: "I went through the original research of the various studies they cited and found that the study reached no such conclusion like the FRC claimed it did."

"These are not honest people simply expressing a contrarian view of politics, like Democrats and Republicans do every day in Washington."

Leading scientific organizations have also denounced attempts to link homosexuality with pedophilia. The American Psychological Association in 2009 concluded that that "homosexual men are not more likely to sexually abuse children than heterosexual men are."

When confronted with the allegations, Sprigg denied distorting evidence.

"We are an advocacy organization," he said. "What I see myself as doing is not creating scholarly research but reading the scholarly research and translating it in a language that can be understood by a lay audience. We certainly have a point of view, but I try to deal as I can, and I never write or say anything I don't believe is true."

He denied that linking homosexuality to child abuse incited hatred.

“We have never said we hate homosexuals, we have never encouraged people to hate homosexuals, we have never encouraged violence against them, so to call us an anti-LGBT hate group is something without foundation,” he said.

Sprigg says that the FRC is itself the target of violence, citing a 2012 attack on the organization’s Washington, D.C., headquarters in which a security guard was injured. The attacker, Floyd Lee Corkins, later told a federal court judge he planned the attack because he was so enraged by the FRC’s anti-gay-marriage position.

### Growing influence

Beirich believes that the religious right’s White House ties and the administration’s reliance on support from the religious right is likely to see the influence of groups like the FRC increase in the months to come. So where is that influence likely to be felt?

“Additional rights for the LGBT community is something they are opposed to. They are big supporters of so-called religious freedom bills in the U.S., which are really there to help people who don’t like gays and don’t want to do business with them,” says Beirich.

“I expect them to be much more powerful,” she adds.

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# **EXHIBIT D**

## Breitbart writer targets transgender UWM student

**Karen Herzog**, Milwaukee Journal Sentinel Published 5:39 p.m. CT Dec. 14, 2016 | Updated 9:54 a.m. CT Dec. 15, 2016



(Photo: USA Today)

A firebrand speaker who was permanently banned from Twitter for "inciting or engaging in the targeted abuse or harassment of others" blasted a transgender student by name at the University of Wisconsin-Milwaukee, prompting the school's chancellor to immediately condemn the speech in a campus-wide email.

Breitbart writer Milo Yiannopoulos brought his "Dangerous Faggot Tour" to the Student Union at UWM on Tuesday night at the invitation of a new student group called Turning Point USA.

During his speech to a crowd the university estimated at 325 to 350 people, plus others watching via live stream on the Breitbart website, Yiannopoulos singled out a transgender student who had protested against a new UWM policy created for its recreation center's locker rooms.

The policy was adopted after the student — who is in the process of physical transition from male to female — used the sauna in the women's locker room last January (<http://using%20the%20sauna%20in%20the%20women's%20locker%20room%20last%20January>). The new policy requires that "non-conforming genitalia be covered at all times," and the university added private showers and changing rooms with curtains to make that easier.

Yiannopoulos named and showed a picture of the student to his audience, and accused the student of being a man trying to find his way into women's bathrooms.

"The way you know he's failed is I can still bang him," said Yiannopoulos, who is gay.

In an email to the campus Tuesday night, shortly after the event ended, chancellor Mark Mone said UWM was prohibited by law from restricting access to its facilities based on the viewpoint of a student organization or a speaker invited by a student organization.

"Free speech is one of UWM's core values and I will support students' decisions to bring a wide array of speakers to our campus — even if the speaker is controversial, and even if I disagree with him or her," Mone said.

"That said, I do not agree with Yiannopoulos' views, and I strongly condemn the belittling of others and their appearance, and the encouragement of hate and harassment. I also will not stand silently by when a member of our campus community is personally and wrongly attacked."

The student withdrew from UWM in October, according to UWM spokesman Tom Luljak.

Mone's statement did little to mollify the student, who directed an angry, expletive-filled email to the chancellor, slamming his response as inadequate, according to a report on Media Milwaukee, the UWM student publication.

"What exactly do you plan to do? OH YEAH, NOTHING, BECAUSE YOU'RE A COWARDLY PIECE OF (expletive)," one passage of the email included in the Media Milwaukee post reads. "Your 'not standing silently' apparently consists of a single email mass-sent to the university. That's it. You don't get a (expletive) cookie for that. What else were you going to go? NOTHING."

Turning Point USA, the group that invited the speaker, started a UWM chapter in October. Its Facebook page says its aim is to educate students "about the importance of fiscal responsibility, free markets and limited government."

### Coincides with Trump visit

The timing of Yiannopoulos' UWM appearance coincided with president-elect Donald Trump's "thank you" tour stop in West Allis. A British citizen, Yiannopoulos has been an outspoken Trump supporter.

As Breitbart's tech writer, Yiannopoulos is a high-profile figure in the "alt-right," or alternative right movement, the name used by a group that promotes white supremacy and a culture dominated by white males of European descent.

Stephen K. Bannon, who Trump has named to be his chief strategist in the White House, chaired Breitbart before taking a leave of absence to run

Trump's campaign. Bannon has described Breitbart as the platform of the alt-right.

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Yiannopoulos was prominently banned from Twitter on 12/13/16. [http://www.washingtonpost.com/news/energy-environment/wp/2016/12/13/what-it-takes-to-get-banned-from-twitter/?utm\\_term=.b99361ae325a](http://www.washingtonpost.com/news/energy-environment/wp/2016/12/13/what-it-takes-to-get-banned-from-twitter/?utm_term=.b99361ae325a) as part of a crackdown on racist abuse targeting "Ghostbusters" actor Leslie Jones.

Breitbart posted a story Wednesday (<http://www.breitbart.com/milo/2016/12/13/wmu-chancellor-condemns-milo/>) that criticized Mone for not speaking out against protesters of Yiannopoulos' speech. About 50 people protested the speaker from a nearby ballroom in the Student Union.

"Every member of our community should feel safe and valued, regardless of beliefs, race, sexual orientation, immigration or other status," Mone said in his statement. "We are at a pivotal moment in our nation's history after a contentious and divisive election. We can continue to use language that widens the divide. Or, we can choose language that bridges gaps and heals. I urge you to join me in seeking ways to reach out and find common ground."   
Buy Photo



UWM Chancellor Mark Mone. (Photo: Rick Wood, Milwaukee Journal Sentinel)

A protest petition circulated by faculty and instructors criticized the university for "hosting someone who has espoused hateful, abusive and dangerous rhetoric."

The petition, signed by 339 people, said that the faculty and instructors were "afraid for our students."

"They question whether or not UWM truly strives to foster a 'caring, compassionate, and collegial community' that promotes 'ethical behavior based on integrity, accountability, and responsibility,'" the petition said, quoting from [UWM's mission and values statements](https://www4.uwm.edu/discover/mission.cfm) (<https://www4.uwm.edu/discover/mission.cfm>).

UWM police and several private security officers hired by the Student Union were present at the event.

While there were no arrests, there was a shouting incident before the event started when a Milo producer went to the ballroom where about 50 people were protesting and engaged with them, Luljak said. Police kept the producer and the protesters apart as the producer videotaped the verbal altercation, and the incident ended quickly, he said.

Yiannopoulos started his speech by showing the just-captured video of his producer sparring with the protesters, Luljak said.

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

AIDEN STOCKMAN; NICOLAS  
TALBOTT; TAMASYN REEVES;  
JAQUICE TATE; JOHN DOES 1-2;  
JANE DOE; and EQUALITY  
CALIFORNIA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United  
States; JAMES N. MATTIS, in his  
official capacity as Secretary of  
Defense; JOSEPH F. DUNFORD, JR.,  
in his official capacity as Chairman of  
the Joint Chiefs of Staff; RICHARD V.  
SPENCER, in his official capacity as  
Secretary of the Navy; RYAN D.  
MCCARTHY, in his official capacity as  
Acting Secretary of the Army;  
HEATHER A. WILSON, in her official  
capacity as Secretary of the Air Force;  
and ELAINE C. DUKE, in her official  
capacity as Acting Secretary of  
Homeland Security,

Defendants.

CASE NO. 2:17-CV-06516

**[PROPOSED] ORDER GRANTING  
DOE PLAINTIFFS' MOTION FOR  
LEAVE TO PROCEED UNDER  
PSEUDONYMS**

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**[PROPOSED] ORDER**

THIS MATTER comes before this Court upon Doe Plaintiffs’ Motion for Leave to Proceed under Pseudonyms. After full consideration, and good cause appearing to the Court, IT IS HEREBY ORDERED THAT:

- 1. Doe Plaintiffs are granted leave to proceed in this litigation under pseudonyms John and Jane Doe;
- 2. Doe Plaintiffs must be referred to by all parties in all public filings, including the Complaint, as John or Jane Doe;
- 3. The identities of Doe Plaintiffs shall not be otherwise disclosed.

IT IS SO ORDERED

Dated:

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Hon.  
United States District Judge