**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND**

BROCK STONE, *et al.*,	
Plaintiffs,	Case 1:17-cv-02459-MJG
v.	Hon. Marvin J. Garbis
DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*,	
Defendants.	

**DEFENDANTS' MEMORANDUM IN RESPONSE TO PLAINTIFF JOHN DOE'S
MOTION TO PROCEED THROUGH PSEUDONYM**

Plaintiffs have moved first to permit plaintiff John Doe to proceed with this suit through

pseudonym and second to allow all individual plaintiffs to omit their home addresses from the

caption of the Complaint. *See* Pls.' Mot. at ECF No. 8-1. Defendants do not oppose the relief

sought in plaintiffs' motion, subject to two conditions, articulated below and reflected in the

attached proposed order.

I.   John Doe's Request to Proceed Anonymously

Plaintiff John Doe is a 25-year-old transgender male who is a Senior Airman in the

United States Air Force at Little Rock Air Force Base, Arkansas, and he seeks to proceed in this

action anonymously out of concern for his safety and the safety of his girlfriend. *See* Compl. ¶¶

24-25; Pls.' Mem. at 3. Defendants do not oppose that request, on the condition that plaintiffs'

counsel provide the identity of plaintiff John Doe and the under seal filings in support of

plaintiffs' motion to defendants, who will (a) use that information only for purposes of defending

this litigation, and (b) not disseminate that information publicly.

II.   Plaintiffs' Request to Omit Home Addresses from Complaint

All individual plaintiffs request the omission of their home addresses from the caption of

the Complaint out of concern that "[p]roviding their home address in the caption will

dramatically increase the scope of potential harassment and violence directed at Individual

Plaintiffs and their families . . . ." Pls.' Mem. at 5. Defendants do not oppose this request on the

condition that plaintiffs inform defense counsel of any changes to the individual plaintiffs'

allegations of residence in the Complaint, *see, e.g.,* Compl. ¶¶ 11, 19, 25, 33, 40, 46.

CONCLUSION

Defendants do not oppose plaintiffs' motion provided that they receive the information,

indicated above, that they may need to defend this case.

Dated: September 21, 2017   Respectfully Submitted,

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Acting Assistant Attorney General
Civil Division

ANTHONY J. COPPOLINO
Deputy Branch Director
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/s/ Ryan B. Parker
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[PROPOSED] ORDER

Plaintiffs' Motion for John Doe to Proceed under Pseudonym and to Omit Individual

Plaintiffs' Home Addresses from the Caption of the Complaint, ECF No. 8-1, having come

before the Court, and the Court having considered that motion, that motion is GRANTED subject

to the terms below.

IT IS HEREBY ORDERED that plaintiff John Doe may proceed through a pseudonym,

provided that through counsel, John Doe provides his identity (along with documents that have

been filed under seal in this matter) to undersigned defense counsel of record, who will use and

share John Doe's identity with defendants and other persons only as needed to defend this

litigation, and will not disclose John Doe's identity publicly.

IT IS FURTHER ORDERED that each of the individual plaintiffs may omit their home

addresses from the caption on the Complaint *provided that* the individual plaintiffs inform

defense counsel of any changes to the individual plaintiffs' residences that occur during the

pendency of this litigation.

Date: _____   _____
                                         UNITED STATES DISTRICT JUDGE