

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

Brock Stone, et al.,

Plaintiffs,

v.

Donald J. Trump, et al.,

Defendants.

Case No. 1:17-cv-02459-MJG

DECLARATION OF RYAN WOOD
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION

I, RYAN WOOD, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.

Personal Background Information

2. I am twenty-four years old. I currently work at an aerospace company as an inventory control clerk. My background, however, is in firefighting, and I am certified as both a firefighter and an emergency medical technician.

3. I am a man.

4. I am transgender.

5. I disclosed my transgender identity to my family and friends in 2011.

6. I began undergoing hormone therapy as a medically-necessary part of my gender transition in 2011. I understand that I received a diagnosis for gender dysphoria around that time. In 2012, I underwent keyhole top surgery as a further medically-necessary part of my gender

transition. I do not anticipate requiring any further surgical care in connection with my gender transition.

7. In 2013, I updated all of my civilian records to accurately reflect my name and gender, including my records with the Department of Motor Vehicles, my birth certificate, my legal name and my records with the Social Security Administration.

8. I am in the process of enlisting in the United States Marine Corps, where I hope to work as a Firefighting and Air Rescue technician. I first met with a Marine Corps recruiter in January 2018, shortly after the ban on accessions by transgender individuals was lifted. Since then I have continued to actively work through the process with the recruiter to complete enlistment paperwork. I am currently working through the medical screening and clearance process. I understand that I have now submitted all necessary medical documentation and I am awaiting medical clearance. I have not been told an exact timetable on how long this process will take.

9. I am planning to join the Marine Corps for several reasons. First and foremost, I wish to serve and protect my country. Second, my father was in the United States Navy, and I have seen what it did for his life and career, and I want to follow his example. Third, military experience would significantly benefit my chosen career as a firefighter.

Effect of the Transgender Service Member Ban

10. Under the 2016 Open Service Directive currently in effect, I can enlist immediately because I meet all of its eligibility criteria. I have been stable without clinically significant distress or impairment as the result of gender dysphoria in social, occupational, or other important areas of functioning for more than 18 months. I have completed all medical treatment associated with my gender transition, been stable in my gender for more than 18 months, and have been stable on cross-sex hormone therapy post-gender transition for more than

18 months. More than 18 months have elapsed since the date of my most recent transition-related surgery and no functional limitations or complications persist, nor do I require any further surgery.

11. I have been working to enlist since the accessions ban was lifted at the beginning of this year.

12. However, under the terms of the Implementation Plan prepared by the Department of Defense in February 2018, I would be disqualified from military service because I have been diagnosed with gender dysphoria, I have undergone gender transition, and I have undergone surgery related to gender transition.

13. The Ban on military service by transgender individuals thus directly threatens my career because it will prevent me from enlisting. This will damage my personal and financial future, as it will deny me the opportunity to serve my country, follow my father's tradition of military service, and prevent me from growing my skills as a first responder.

14. The Ban has also created personal anxiety and uncertainty for me. I feel as though my service is being rejected and that I am unwanted. I have wanted to join the military since I was fourteen years old, and now that is in jeopardy. When the Open Service Directive was released in 2016, I was ecstatic. I began going to the gym six days a week to prepare myself to meet the physical training requirements.

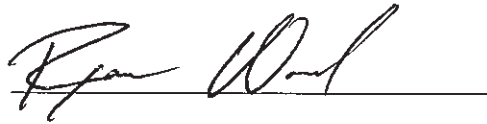
15. When the Transgender Service Member Ban was announced last year it was devastating. Since then, it has been a roller coaster of emotions, some days feeling optimistic and others feeling like I am getting my hopes up for nothing.

16. The Ban also potentially impacts my current career. If I am not able to enlist, I want to return to my career in firefighting. However, I have been postponing doing that to pursue

military service. My first goal is to serve in the military, and I do not want to waste a fire department's time applying if I am going to leave to join the military. But if I am not able to enlist, I would have put my secondary career goals as a firefighter on hold for nothing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 23 day of April, 2018 in Puyallup, Washington.

A handwritten signature in cursive script, appearing to read "Ryan Wood", is written over a horizontal line.

RYAN WOOD

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**DECLARATION OF SEVEN ERO GEORGE
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION**

I, SEVEN ERO GEORGE, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.
2. Since this lawsuit was filed I have continued to serve in the United States Air National Guard.
3. In December 2017 I graduated from Henry Ford College with an Associate's Degree in Nursing. In January 2018, I began attending the University of Michigan, Flint, where I am enrolled in an RN-to-BSN (Registered Nurse to Bachelor's of Science in Nursing) program to earn a Bachelor's degree in nursing. I have also begun working as a civilian nurse.
4. I am still awaiting completion of the process of updating my gender marker in DEERS. That process continues to drag on. I have continued to provide additional information and documentation, and frequently have been forced to wait for months at a time to find out whether this new information is sufficient, during which time neither I nor my commander is able to get a clear answer from the National Guard Bureau as to the status of my request.

Frequently they have given us no answer at all. The approval process remains ongoing. Each time new information or documentation has been requested, I have quickly provided it.

5. My plan continues to be to apply for a commission in the United States Army to work in a medical field, ideally nursing, as soon as my gender marker is updated. Given how long that process has taken, I have also had discussions with a recruiter about commissioning even before that. Because I have a prior Bachelor's degree in a different field, I am eligible to commission immediately, even before completing my second Bachelor's in Nursing.

6. My current command and co-workers continue to be supportive of me.

7. I continue to have significant concerns and stress about my future in the military under the Implementation Plan released by the Department of Defense in February 2018.

Although I hope I will be able to continue to serve out my current contract, I do not know what that means for my future or whether I will be able to re-enlist. My current contract expires in 2021. My goal is to serve in the military for my entire career, and if I were not able to sign an additional contract to serve past the expiration of my current contract, it would be a tremendous loss, both financially and personally. I have planned my career and financial future around serving my country for at least 20 years. To be denied that goal because of the Transgender Service Member Ban would be devastating.

8. I am extremely concerned that, under the terms of the Implementation Plan, my application for a commission might be denied in connection with my transgender identity.

9. Finally, I am concerned about what kinds of medical care I will have access to under the Implementation Plan. Under the terms of the Implementation Plan I have concerns that I may not be able to receive all of the medical care that is truly medically necessary for me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 22 day of April, 2018 in Clinton Township MI.



SEVERO GEORGE

**IN THE UNITED STATES DISTRICT COURT
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**DECLARATION OF TEAGAN GILBERT
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION**

I, TEAGAN GILBERT, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.
2. Since this lawsuit was filed I have continued to serve in the United States Navy Reserve in the same command.
3. I am currently enrolled at Arizona State University and am scheduled to graduate in Spring 2019. My plan continues to be to apply for a commission upon graduation.
4. My command and co-workers continue to be supportive of me.
5. I have significant concerns and anxiety about my future in the military under the Implementation Plan released by the Department of Defense in February 2018. Although I hope I will be able to continue to serve in my current capacity, I do not know what that means for my future. I am concerned that I will not be able to receive a commission in view of the terms of the Implementation Plan.

6. I also recently signed a re-enlistment contract, and at the end of that contract I will have served 18 years, leaving me two years short of significant retirement benefits. If I were not able to sign an additional contract to serve out those two additional years, it would be a tremendous loss, both financially and personally. I have planned my career and financial future around serving my country for at least 20 years. To be denied that goal because of the Transgender Service Member Ban would be devastating.

7. I am also concerned about what kinds of medical care I will have access to under the Implementation Plan. I am worried that I may not be able to get all of the medical care that is truly medically necessary for me, including medically necessary surgery which is indicated on my plan, and which I am tentatively scheduled to undergo during the summer of this year.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 23 day of April, 2018 in Peoria, Arizona.



TEAGAN GILBERT

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DECLARATION OF TOMMIE PARKER
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION

I, TOMMIE PARKER, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.
2. Since this lawsuit was filed I have continued to serve in the Air National Guard in the same command.
3. My command and co-workers continue to be supportive of me.
4. I continue to have significant concerns and anxiety about my future in the military under the Implementation Plan released by the Department of Defense in February 2018.

Although I hope I will be able to continue to serve in my current capacity, I do not know what that means for my future.

5. I recently signed a re-enlistment contract under which I will serve until 2021, which will take me to 20 years of active duty service time and confer significant retirement benefits. I have planned my career and financial future around serving my country for at least 20

years, and if I were not able to serve out that contract for any reason because of the Transgender Service Member Ban, it would be devastating.

6. I am also concerned about what kinds of medical care I will have access to under the Implementation Plan. I am still in the process of having my medical transition plan approved and I am worried that I may not be able to get all of the medical care that is truly medically necessary for me under the terms of the Implementation Plan.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 22 day of April, 2018 in Sparrow Bush, New York


TOMMIE PARKER