

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JANE DOE 2, JANE DOE 3, JANE DOE 4,
JANE DOE 5, JANE DOE 6, JANE DOE 7,
JOHN DOE 1, JOHN DOE 2, REGAN V.
KIBBY, and DYLAN KOHERE,

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; the UNITED STATES
DEPARTMENT OF THE ARMY; MARK T.
ESPER, in his official capacity as Secretary of
the Army; the UNITED STATES
DEPARTMENT OF THE NAVY; RICHARD
V. SPENCER, in his official capacity as
Secretary of the Navy; the UNITED STATES
DEPARTMENT OF THE AIR FORCE;
HEATHER A. WILSON, in her official
capacity as Secretary of the Air Force; the
UNITED STATES COAST GUARD;
KIRSTJEN M. NIELSEN, in her official
capacity as Secretary of Homeland Security; the
DEFENSE HEALTH AGENCY; RAQUEL C.
BONO, in her official capacity as Director of
the Defense Health Agency; and the UNITED
STATES OF AMERICA,

Defendants.

Civil Action No. 17-cv-1597 (CKK)

ERRATA

Plaintiffs’ counsel inadvertently included the wrong year for dates in the Declaration of Kevin M. Lamb attached to their reply (ECF No. 126) in support of their motion to compel compliance with subpoenas directed to nonparties Family Research Council and Heritage

Foundation. For the Court's convenience, Plaintiffs have submitted a corrected declaration as an attachment to this errata.

April 30, 2018

Claire Laporte (*pro hac vice*)
Matthew E. Miller (*pro hac vice*)
Daniel McFadden (*pro hac vice*)
Kathleen M. Brill (*pro hac vice*)
Michael Licker (*pro hac vice*)
Rachel C. Hutchinson (*pro hac vice*)
Lauren Godles Milgroom (*pro hac vice*)
FOLEY HOAG LLP
155 Seaport Blvd.
Boston, Massachusetts 02210
Telephone: 617-832-1000
Fax: 617-832-7000

Theresa M. Roosevelt (D.C. Bar No. 1021853)
FOLEY HOAG LLP
1717 K Street NW
Washington, DC 20006
Telephone: 202-223-1200
Fax: 202-785-6687

Jennifer Levi (*pro hac vice*)
Mary L. Bonauto (*pro hac vice*)
GLBTQ LEGAL ADVOCATES & DEFENDERS
18 Tremont St., Ste. 950
Boston, Massachusetts 02108
Telephone: 617-426-1350
Fax: 617-426-3594

Shannon P. Minter (*pro hac vice*)
Amy Whelan (*pro hac vice*)
Chris Stoll (*pro hac vice*)
NATIONAL CENTER FOR LESBIAN RIGHTS
870 Market St., Ste. 370
San Francisco, California 94102
Telephone: 415-392-6257
Fax: 415-392-8442

Respectfully submitted,

/s/ Kevin M. Lamb
Paul R.Q. Wolfson (D.C. Bar No. 414759)
Kevin M. Lamb (D.C. Bar No. 1030783)
WILMER CUTLER PICKERING
HALE & DORR LLP
1875 Pennsylvania Ave. N.W.
Washington, D.C. 20006
Telephone: 202-663-6000
Fax: 202-663-6363

Alan E. Schoenfeld (*pro hac vice*)
WILMER CUTLER PICKERING
HALE & DORR LLP
7 World Trade Center
250 Greenwich St.
New York, New York 10007
Telephone: 212-230-8800
Fax: 212-230-8888

Christopher R. Looney (*pro hac vice*)
Harriet Hoder (*pro hac vice*)
Adam M. Cambier (*pro hac vice*)
WILMER CUTLER PICKERING
HALE & DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: 617-526-6000
Fax: 617-526-5000

Nancy Lynn Schroeder (*pro hac vice*)
WILMER CUTLER PICKERING
HALE & DORR LLP
350 S. Grand Ave., Ste. 2100
Los Angeles, California 90071
Telephone: 213-443-5300
Fax: 213-443-5400

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JANE DOE 2, JANE DOE 3, JANE DOE 4,
JANE DOE 5, JANE DOE 6, JANE DOE 7,
JOHN DOE 1, JOHN DOE 2, REGAN V.
KIBBY, and DYLAN KOHERE,

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; the UNITED STATES
DEPARTMENT OF THE ARMY; MARK T.
ESPER, in his official capacity as Secretary of
the Army; the UNITED STATES
DEPARTMENT OF THE NAVY; RICHARD
V. SPENCER, in his official capacity as
Secretary of the Navy; the UNITED STATES
DEPARTMENT OF THE AIR FORCE;
HEATHER A. WILSON, in her official
capacity as Secretary of the Air Force; the
UNITED STATES COAST GUARD;
KIRSTJEN M. NIELSEN, in her official
capacity as Secretary of Homeland Security; the
DEFENSE HEALTH AGENCY; RAQUEL C.
BONO, in her official capacity as Director of
the Defense Health Agency; and the UNITED
STATES OF AMERICA,

Defendants.

Civil Action No. 17-cv-1597 (CKK)

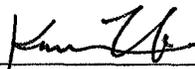
**CORRECTED DECLARATION OF KEVIN M. LAMB
IN SUPPORT OF PLAINTIFFS' REPLY IN SUPPORT OF THEIR MOTION TO
COMPEL COMPLIANCE WITH SUBPOENAS DIRECTED TO NONPARTIES
FAMILY RESEARCH COUNCIL AND HERITAGE FOUNDATION**

I, Kevin M. Lamb, hereby declare:

1. All facts set forth herein are based on my personal knowledge, and if called upon to testify as to the contents of this Declaration, I could and would do so.
2. I am an attorney with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Plaintiffs in the above-captioned matter.
3. I provide this declaration in support of Plaintiffs' reply in support of their motion (ECF No. 109) to compel compliance with subpoenas directed to nonparties the Family Research Council and the Heritage Foundation.
4. Attached hereto as **Exhibit A** is a true and correct copy of correspondence, Bates-numbered USDOE00022181 through USDOE00022190, between the Family Research Council and Defendants, as produced by Defendants in this case.
5. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiffs' notice of subpoena, dated April 11, 2018, directed to the Family Research Council.
6. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiffs' notice of subpoena, dated April 11, 2018, directed to the Heritage Foundation.
7. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiffs' proof of service of the April 11, 2018 subpoena directed to the Family Research Council.
8. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiffs' proof of service of the April 11, 2018 subpoena directed to the Heritage Foundation.

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

Dated: April 30, 2018
Washington, D.C.



Kevin M. Lamb