

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

CODY FLACK and
SARA ANN MAKENZIE,

Plaintiffs,

v.

WISCONSIN DEPARTMENT OF
HEALTH SERVICES and
LINDA SEEMEYER, in her official capacity
as Secretary of the Wisconsin Department of
Health Services,

Defendants.

Case No. 3:18-cv-00309-wmc
Judge William Conley

DECLARATION OF KATHERINE M. GAST, MD, MS

I, Katherine M. Gast, MD, MS, based on personal knowledge, declare as follows:

1. I am a fellowship-trained plastic and reconstructive surgeon at UW Health in Madison, Wisconsin. My practice focuses on providing gender affirmation surgeries for transgender people. In my practice, I treat transgender patients consistent with the World Professional Association for Transgender Health's Standards of Care.

2. On February 8, 2018, I had a consultation with Sara Ann Makenzie to discuss genital reconstruction surgery, specifically a bilateral orchiectomy and vaginoplasty, as a treatment for gender dysphoria. Ms. Makenzie was referred to me by her treating physician, Dr. Beth Potter.

3. Based on that consultation, I determined that once Ms. Makenzie provided two letters of support from her treating medical providers, which she told me she would do, Ms. Makenzie would be eligible for the surgical procedures listed above based on the applicable standards of care.

4. I understand this declaration may be submitted in connection with Ms. Makenzie's claims in the above-captioned lawsuit. I do not take a position regarding the legal questions raised in that lawsuit.

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

Executed this 22 day of May, 2018.

A handwritten signature in black ink, appearing to read "K. Gast", written over a horizontal line.

Katherine Gast, MD, MS