

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

CODY FLACK,  
SARA ANN MAKENZIE,  
MARIE KELLY, and  
COURTNEY SHERWIN,

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

**SECOND SUPPLEMENTAL DECLARATION OF SARA ANN MAKENZIE**

I, Sara Ann Makenzie, declare as follows:

1. I am one of the plaintiffs in the above-captioned case. I have personal knowledge of the matters stated in this declaration. This declaration supplements my two previous declarations submitted in support with the Motion for Preliminary Injunction [Dkt. Nos. 23 and 61] to provide updated and additional information to the Court.

2. Following the preliminary injunction entered by the Court on July 25, 2018, the prior authorization request for Wisconsin Medicaid coverage for my genital reconstruction surgery submitted by Dr. Katherine Gast at UW Health was approved.

3. I am in the process of scheduling my surgery with Dr. Gast. However, she has no more available appointments for surgery in 2018, so I am on the waitlist for an appointment in 2019.

4. I chose to file this lawsuit not only for myself, but also for other Wisconsin Medicaid recipients who need gender-confirming surgeries and medical treatments. This case is not just about me—it's bigger than me. It is important for all of us to receive the health care we need. No one should be treated like a second-class citizen. I feel strongly for others' well-being and I don't want anyone to have to go through the pain, anxiety, and distress that I have gone through just to obtain medical care. I will continue to fight, through this lawsuit, for every transgender individual on Wisconsin Medicaid who still needs gender-confirming care until the case is complete.

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

Executed this 18th day of October, 2018.

Sara Ann Makenzie.  
SARA ANN MAKENZIE