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Plastic Surgery
Department of Surgery
UNIVERSITY OF WISCONSIN
SCHOOL OF MEDICINE AND PUBLIC HEALTH

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

CODY FLACK, *et al.*,

Plaintiffs,

v.

WISCONSIN DEPARTMENT OF
HEALTH SERVICES, *et al.*,

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 with the University of Wisconsin, practicing 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. I previously provided a declaration in this case on May 22, 2018.

3. Since April 30, 2018, I have seen twenty-five patients seeking transgender health care, specifically gender affirmation surgery, who are insured by Wisconsin Medicaid.

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4. Of those patients, I have submitted eight prior authorizations to Wisconsin Medicaid. All of those prior authorizations have been denied. The remaining patients did not have a prior authorization initiated because we knew it would be denied.

5. I understand this declaration may be submitted in connection with the plaintiffs' claims in the above-captioned lawsuit. This declaration is based upon my treatment of patients. I am not offering an expert opinion about transgender health matters in general, and 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 February, 2019.

Katherine Gast, MD, MS