

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**DYLAN BRANDT, by and through his mother, Joanna Brandt; JOANNA BRANDT; SABRINA JENNEN, by and through her parents, Lacey and Aaron Jennen; LACEY JENNEN; AARON JENNEN; BROOKE DENNIS, by and through her parents, Amanda and Shayne Dennis; AMANDA DENNIS; SHAYNE DENNIS; PARKER SAXTON, by and through his father, DONNIE SAXTON; DONNIE SAXTON; MICHELE HUTCHISON, on behalf of herself and her patients; and KATHRYN STAMBOUGH, on behalf of herself and her patients**

**PLAINTIFFS**

**v.**

**Case No. 4:21CV450-JM**

**LESLIE RUTLEDGE, in her official capacity as the Arkansas Attorney General; AMY E. EMBRY, in her official capacity as the Executive Director of The Arkansas State Medical Board; and SYLVIA D. SIMON, ROBERT BREVING JR., VERYL D. HODGES, JOHN H. SCRIBNER, ELIZABETH ANDERSON, RHYS L. BRANMAN, EDWARD "WARD" GARDNER, RODNEY GRIFFIN, BETTY GUHMAN, BRIAN T. HYATT, TIMOTHY C. PADEN, DON R. PHILIPS, WILLIAM L. RUTLEDGE, and DAVID L. STAGGS, in their official capacity as members of the Arkansas State Medical Board**

**DEFENDANTS**

**AFFIDAVIT OF SERVICE**

COMES the Affiant, having been duly sworn under oath, and states:

1. My name is Beth Echols, and I am the attorney for the Plaintiffs in the above-styled matter.
2. On May 25, 2021, I filed the Complaint against Defendants in this action.
3. On May 25, 2021, I e-mailed a true and correct copy of the Complaint and Summons to Separate Defendant Amy E. Embry in her official capacity as the Executive Director of the Arkansas State Medical Board and Separate Defendants, Sylvia D. Simon, Robert Brevings, Jr., Veryl D. Hodges, John H. Scribner, Elizabeth Anderson, Rhys L. Branman, Edward "Ward"

Gardner, Rodney Griffin, Betty Guhman, Brian T. Hyatt, Timothy C. Paden, Don R. Phillips, William L. Rutledge, and David L. Staggs, in their official capacity as members of the Arkansas State Medical Board, to their attorney, Kevin O'Dwyer.

4. On May 28, 2021, the attorney for the Separate Defendants identified in Paragraph 3 received and accepted service of the Summons and Complaint, as evidenced by e-mail attached hereto as Exhibit A.

Further Affiant sayeth not.

Respectfully submitted,

Beth Echols  
Beth Echols, Ark. Bar No. 2002203

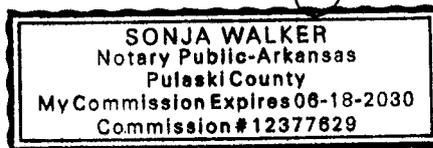
COUNTY OF Pulaski )  
 )ss.  
STATE OF ARKANSAS )

SUBSCRIBED AND SWORN to before me, a Notary Public, this 8<sup>th</sup> day of June, 2021.

Sonja Walker

My Commissioner Expires

6/18/30



**Beth Echols**

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**From:** Kevin O'Dwyer <kodwyer@htolaw.com>  
**Sent:** Friday, May 28, 2021 8:20 AM  
**To:** Beth Echols  
**Subject:** RE: Lawsuit filed today

Beth,

I have been authorized to accept service. I have forwarded the complaint to Vincent Wagner at the AG's office.

Kevin M. O'Dwyer  
**Hope, O'Dwyer, Wilson & Arnold, P.A.**  
211 Spring Street  
Little Rock, Arkansas  
Telephone: 501-372-4144  
Facsimile: 501-372-7480

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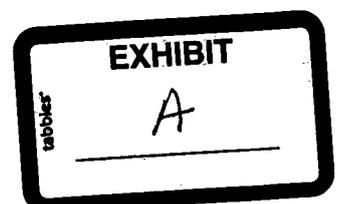
vincent.wagner@arkansasag.gov

**From:** Beth Echols <echols@gill-law.com>  
**Sent:** Tuesday, May 25, 2021 3:55 PM  
**To:** Kevin O'Dwyer <kodwyer@htolaw.com>  
**Cc:** Drake Mann <mann@gill-law.com>; Holly Dickson <holly@acluarkansas.org>  
**Subject:** Lawsuit filed today

Kevin,

I'm sure it will not come as a surprise to you that the ACLU has filed a challenge to the transgender youth healthcare ban. I am local counsel for the lawsuit, and the Executive Director of The Arkansas State Medical Board along with the members are sued in their official capacity. Please advise if you can accept service of the Complaint and Summons on behalf of the Board and its members. I've attached a copy of the Complaint as well as the Summons here.

Best,  
Beth



**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**DYLAN BRANDT, by and through his mother, Joanna Brandt; JOANNA BRANDT; SABRINA JENNEN, by and through her parents, Lacey and Aaron Jennen; LACEY JENNEN; AARON JENNEN; BROOKE DENNIS, by and through her parents, Amanda and Shayne Dennis; AMANDA DENNIS; SHAYNE DENNIS; PARKER SAXTON, by and through his father, DONNIE SAXTON; DONNIE SAXTON; MICHELE HUTCHISON, on behalf of herself and her patients; and KATHRYN STAMBOUGH, on behalf of herself and her patients**

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**DEFENDANTS**

**AFFIDAVIT OF SERVICE**

COMES the Affiant, having been duly sworn under oath, and states:

1. My name is Beth Echols, and I am the attorney for the Plaintiffs in the above-styled matter.
2. On May 25, 2021, I filed the Complaint against Defendants in this action.
3. On May 25, 2021, Holly Dickson e-mailed a true and correct copy of the Complaint and Summons to Separate Defendant Leslie Rutledge's attorney, Nicholas Bruni, and copied me on said email.

4. On May 26, 2021, Separate Defendant Leslie Rutledge's attorney received and accepted service of the Summons and Complaint, as evidenced by e-mail attached hereto as Exhibit A.

Further Affiant sayeth not.

Respectfully submitted,

Beth Echols  
Beth Echols, Ark. Bar No. 2002203

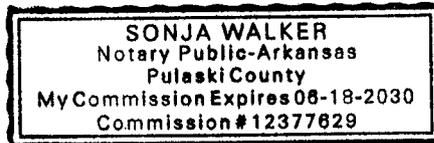
COUNTY OF Pulaski )

STATE OF ARKANSAS )ss.  
)

SUBSCRIBED AND SWORN to before me, a Notary Public, this 8<sup>th</sup> day of June, 2021.

Sonja Walker

My Commissioner Expires  
6/18/30



**Beth Echols**

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**From:** Nicholas Bronni <nicholas.bronni@arkansasag.gov>  
**Sent:** Wednesday, May 26, 2021 3:48 PM  
**To:** 'Holly Dickson'  
**Cc:** Beth Echols; Vincent Wagner  
**Subject:** RE: Filing

Sorry for the delay. We accept service on behalf of the AG.

Nick

**From:** Holly Dickson <holly@acluarkansas.org>  
**Sent:** Wednesday, May 26, 2021 2:22 PM  
**To:** Nicholas Bronni <nicholas.bronni@arkansasag.gov>  
**Cc:** echols@gill-law.com  
**Subject:** RE: Filing

Hi Nick,

Bumping this to see if you have or will have a response for us soon today.  
I suspect you'd rather us not send a process server, but we do need to hear back so I don't have to start that process.

Thank you,

H

**From:** Nicholas Bronni <nicholas.bronni@arkansasag.gov>  
**Sent:** Wednesday, May 26, 2021 8:04 AM  
**To:** Holly Dickson <holly@acluarkansas.org>  
**Cc:** echols@gill-law.com  
**Subject:** RE: Filing

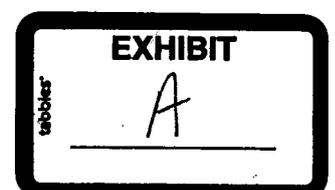
Holly-

I should be able to, but let me confirm and get back to you.

Nick

**Nicholas J. Bronni**  
**Solicitor General**  
Office of Arkansas Attorney General Leslie Rutledge

323 Center Street, Suite 200  
Little Rock, Arkansas 72201  
501.682.6302 | 501.682.2000  
[Nicholas.bronni@arkansasag.gov](mailto:Nicholas.bronni@arkansasag.gov) | [ArkansasAG.gov](http://ArkansasAG.gov)



**Beth Echols**

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**From:** Holly Dickson <holly@acluarkansas.org>  
**Sent:** Tuesday, May 25, 2021 3:53 PM  
**To:** nicholas.bronni@arkansasag.gov  
**Cc:** Beth Echols  
**Subject:** FW: Filing - summons  
**Attachments:** Filed Summons LESLIE RUTLEDGE.pdf  
  
**Importance:** High

Hi Nick,

Attached is the summons, as well. We look forward to hearing back from you very soon.

Thank you,

Holly

**From:** Holly Dickson <holly@acluarkansas.org>  
**Sent:** Tuesday, May 25, 2021 3:21 PM  
**To:** nicholas.bronni@arkansasag.gov  
**Cc:** Beth Echols <echols@gill-law.com>  
**Subject:** FW: Filing

Hi Nick,

Please see the attached Complaint and let us know if you will accept service on behalf of the Attorney General.

**Holly Dickson**

pronouns: she, her, hers

Executive Director & Legal Director  
ACLU of Arkansas  
904 West 2nd Street, Little Rock, AR 72201  
■ 501.374.2842 office ■ 501.993.7352 mobile  
holly@acluarkansas.org  
www.acluarkansas.org

**ACLU**  
Arkansas

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