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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
)
) Plaintiffs,)
)
) v.)
)
) U.S. DEPARTMENT OF EDUCATION and)
) Suzanne GOLDBERG, in her official capacity as)
) Acting Assistant Secretary for Civil Rights,)
) U.S. Department of Education,)
)
) Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF HAYDEN
BROWN IN SUPPORT OF
MOTION TO AMEND
MOTION FOR
TRO/PRELIMINARY
INJUNCTION**

I, Hayden Brown, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. When it came to going onto campus after the lawsuit went public I didn't want to risk it. I laid low for a month, and stayed with a friend off campus and only went to work and came back, because I didn't want to interact with the community once they were aware that I was a plaintiff.
3. Sometimes I feel hate when teachers are weird, strange, unnatural in their verbiage, their diction, how they choose to say things, or not choosing to say things. Seeing the dichotomy of how they interacted with others vs. how they interacted with me was

distracting, and separating. In education we talk about rapport, or our relationship with students, as that is the main focus of a teacher. This was the exact opposite of what I experienced with these teachers, and it kept us from building those relationships, harming my ability to learn.

4. As a queer student at York, hate is everywhere and pervasive. You hear the word "fag" in your room, on the sidewalk, in the cafeteria, in class. Most days when I came home from work and walked in the dark I feared for my life, held keys between my fingers.
5. As a student starting out a new year, I should just feel excited, excited to see my friends, excited to see the teachers I have built a relationship with, for the college experience, and I should feel a sense of happiness and anticipation for being able to live that college life and experience. But instead I feel dread every year returning to Campus. Each year I was a Resident Assistant, I was anxious and uneasy. I didn't know who would be my friend, who wouldn't, and I was never quite sure where I stood. And I had the experience of nervousness.
6. My biggest fear is that for like a year and a half of my college time at York, I worked fairly diligently to fix the rules in a nice way. It didn't work out, but I made a lot of changes in the staff and faculty's personal opinions and theologies. I fear this lawsuit might revert them back to who they were, and worry that the case will be perceived as an attack on them, or personal condemnation, when it is not meant like that. I don't want them to take that somewhere bad or lose the progress and personal relationships that we created.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 24th day of August, 2021.

By: s/ Hayden Brown
Hayden Brown
