

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

REV. PAUL A. EKNES-TUCKER, )  
*et al.*, )  
 )  
*Plaintiffs*, )  
 )  
v. ) No. 2:22-cv-00184-LCB-SRW  
 )  
KAY IVEY, in her official capacity )  
as Governor of the State of Alabama, )  
*et al.*, )  
 )  
*Defendants*. )

**DEFENDANTS' EXHIBIT LIST AND NOTICE OF FILING  
OF EVIDENCE IN OPPOSITION TO PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

Defendants Kay Ivey, in her official capacity as Governor of the State of Alabama; Steve Marshall, in his official capacity as Attorney General of the State of Alabama; Daryl D. Bailey, in his official capacity as District Attorney for Montgomery County; C. Wilson Blaylock, in his official capacity as District Attorney for Cullman County; Jessica Ventiere, in her official capacity as District Attorney for Lee County; Tom Anderson, in his official capacity as District Attorney for the 12<sup>th</sup> Judicial Circuit; and Danny Carr, in his official capacity as District Attorney for Jefferson County, submit the following exhibit list for the preliminary injunction hearing scheduled for May 5 and 6, 2022. Defendants also give notice of the filing of the exhibits listed below. These same exhibits will be cited in

Defendants' brief in opposition to the Plaintiffs' motion, which will be filed separately.

### Exhibit List

- D1 Alabama Vulnerable Child Compassion and Protection Act, Act 2022-289 (SB184)
- D2 Declaration of Dr. James Cantor, Ph.D.
- D3 Declaration of Dr. Michael K. Laidlaw, M.D.
- D4 Declaration of Dr. Quentin L. Van Meter, M.D.
- D5 Declaration of Dr. Paul W. Hruz, M.D., Ph.D.
- D6 Declaration of Dr. Patrick Hunter, M.D.
- D7 Declaration of Dr. Dianna Kenny, Ph.D.
- D8 Stephen B. Levine, E. Abbruzzese & Julia M. Mason, *Reconsidering Informed Consent for Trans-Identified Children, Adolescents, and Young Adults*, J. OF SEX & MARITAL THERAPY (Mar. 17, 2022)
- D9 *Evidence Review: Gonadotropin Releasing Hormone Analogues for Children and Adolescents with Gender Dysphoria*, Nat'l Inst. for Health & Care Excellence (NICE) (released Mar. 11, 2021), available at <https://arms.nice.org.uk/resources/hub/1070905/attachment>
- D10 *Evidence Review: Gender-Affirming Hormones for Children and Adolescents with Gender Dysphoria*, Nat'l Inst. for Health & Care Excellence (NICE) (released Mar. 11, 2021), available at <https://arms.nice.org.uk/resources/hub/1070871/attachment>
- D11 Sweden National Board of Health and Welfare Policy Statement, Socialstyrelsen, *Care of Children and Adolescents with Gender Dysphoria: Summary* (2022) available at <https://www.socialstyrelsen.se/globalassets/sharepoint-dokument/artikelkatalog/kunskapsstod/2022-3-7799.pdf>

- D12 Finland's Council for Choices in Healthcare Policy Statement, Palveluvalikoima, *Recommendation of the Council for Choices in Health Care in Finland (PALKO / COHERE Finland)* unofficial translation by Society for Evidence Based Medicine available in English at [https://segm.org/sites/default/files/Finnish\\_Guidelines\\_2020\\_Minors\\_Unofficial%20Translation.pdf](https://segm.org/sites/default/files/Finnish_Guidelines_2020_Minors_Unofficial%20Translation.pdf)
- D13 Académie Nationale de Médecine, *Medicine and Gender Transidentity in Children and Adolescents* (Feb. 25, 2022), available at <https://www.academie-medecine.fr/wp-content/uploads/2022/03/22.2.25-Communique-PCRA-19-Gender-identity-ENG.pdf>
- D14 The Royal Australian & New Zealand College of Psychiatrists, *Recognising and Address the Mental Health Needs of People Experiencing Gender Dysphoria / Gender Incongruence*, Position Statement 103 (Aug. 2021), available at <https://perma.cc/LR94-73ZU>
- D15 *Bell v. Tavistock & Portman Nat'l Health Serv. Found. Tr.* [2020] EWHC (Admin) 3274
- D16 Centers for Medicare & Medicaid Services, Tamara Syrek Jensen, et al., *Decision Memo for Gender Dysphoria and Gender Reassignment Surgery* (CAG-00446N) (Aug. 30, 2016), available at <https://perma.cc/9CQN-938N>
- D17 Am. Psychiatric Ass'n, *DIAGNOSTIC AND STATISTICAL MANUAL OF MENTAL DISORDERS* (5th ed. 2013) (excerpts)
- D18 World Professional Ass'n for Transgender Health (WPATH), *Standards of Care for the Health of Transsexual, Transgender, and Gender-Conforming People* (7th Version) (2012)
- D19 Wylie C. Hembree et al., *Endocrine Treatment of Gender-Dysphoric/Gender-Incongruent Persons: An Endocrine Society Clinical Practice Guidelines*, 102 J. CLINICAL ENDOCRINOLOGY & METABOLISM 3869 (Nov. 2017)
- D20 Lisa Littman, *Parent Reports of Adolescents & Young Adults Perceived to Show Signs of a Rapid Onset of Gender Dysphoria*, PLOS ONE 13(8):e0202330

- D21 Lisa Littman, *Individuals Treated for Gender Dysphoria with Medical and/or Surgical Transition who Subsequently Detransitioned: A Survey of 100 Detransitioners*, 50 ARCHIVES OF SEXUAL BEHAVIOR No. 50, 3353-54 (Oct. 2021)
- D22 Elie Vandebussche, *Detransition-Related Needs and Support: A Cross-Sectional Online Survey*, JOURNAL OF HOMOSEXUALITY (Apr. 30, 2021), available at <https://doi.org/10.1080/00918369.2021.1919479>
- D23 Annelou de Vries et al., *Young Adult Psychological Outcome After Puberty Suppression and Gender Reassignment*, 130 PEDIATRICS, No. 4, 696-704 (Oct. 2014)
- D24 Jason Rafferty, *Policy Statement, Am. Academy of Pediatrics, Ensuring Comprehensive Care & Support for Transgender & Gender-Diverse Children & Adolescents*, 142 Pediatrics no. 4, at 3 (Oct. 2018), available at <https://perma.cc/EE6U-PN66>
- D25 Am. Psych. Ass'n, *Guidelines for Psychological Practice with Transgender and Gender Nonconforming People*, 70 Am. Psychologist 832, 836 (Dec. 2015), available at <https://www.apa.org/practice/guidelines/transgender.pdf>
- D26 Declaration of Corinna Cohn
- D27 Declaration of Sydney Wright
- D28 Declaration of Carol Frietas
- D29 Declaration of Barbara F.\*
- D30 Declaration of John Doe\*
- D31 Declaration of John Roe\*
- D32 Declaration of Kristine W.\*
- D33 Declaration of Yaacov Sheinfeld

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\* Proceeding using a pseudonym to protect the privacy of minor children suffering from gender dysphoria.

D34 Declaration of Martha S.\*

D35 Declaration of KathyGrace Duncan

D36 Declaration of Jeanne Crowley\*

D37 Declaration of Ted H. Halley

D38 Declaration of Kellie C.\*

D39 Declaration of Gary Warner

D40 April 15, 2022 emails regarding *Ladinsky v. Ivy* litigation

Defendants reserve the right to proffer rebuttal exhibits, impeachment exhibits, and any exhibit listed by another party to this action. Pursuant to this Court's order (doc. 34), Defendants file a copy of each exhibit.

Respectfully submitted,

Steve Marshall  
*Attorney General*

Edmund G. LaCour Jr. (ASB-9182-U81L)  
*Solicitor General*

A. Barrett Bowdre (ASB-2087-K29V)  
Thomas A. Wilson (ASB-1494-D25C)  
*Deputy Solicitors General*

s/ James W. Davis  
James W. Davis (ASB-4063-I58J)  
*Deputy Attorney General*

Benjamin M. Seiss (ASB-2110-O00W)  
*Assistant Attorney General*

OFFICE OF THE ATTORNEY GENERAL  
STATE OF ALABAMA  
501 Washington Avenue

Christopher Mills  
(SC Bar No. 101050)  
(*pro hac vice* motion  
pending)

SPERO LAW LLC  
557 East Bay St.  
#22251  
Charleston, SC 29451  
Telephone: (843)  
606-0640  
cmills@spero.law

P.O. Box 300152  
Montgomery, Alabama 36130-0152  
Telephone: (334) 242-7300  
Edmund.LaCour@AlabamaAG.gov  
Barrett.Bowdre@AlabamaAG.gov  
Thomas.Wilson@AlabamaAG.gov  
Jim.Davis@AlabamaAG.gov  
Ben.Seiss@AlabamaAG.gov  
*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

I certify that I electronically filed this document using the Court's CM/ECF system on May 2, 2022, which will serve all counsel of record.

s/ James W. Davis  
*Counsel for Defendants*