

1 Colin M. Proksel  
OSBORN MALEDON, P.A.  
2 2929 North Central Avenue, 21st Floor  
Phoenix, Arizona 85012-2793  
3 State Bar No. 034133  
Telephone: (602) 640-9000  
4 Facsimile: (602) 640-9050  
Email: cproksel@omlaw.com  
5

6 *Attorney for Plaintiffs*

7 *Additional counsel listed on following page*

8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF ARIZONA**  
**TUCSON DIVISION**

10 Jane Doe, by her next friend and parents  
Helen Doe and James Doe, and Megan  
11 Roe, by her next friend and parents, Kate  
Roe and Robert Roe,  
12

13 Plaintiffs,

14 v.

15 Thomas C. Horne in his official capacity  
as State Superintendent of Public  
Instruction; Laura Toenjes, in her official  
16 capacity as Superintendent of the Kyrene  
School District; Kyrene School District;  
17 The Gregory School; and Arizona  
Interscholastic Association Inc.,  
18

19 Defendants.

Case No. \_\_\_\_\_

**DECLARATION OF JANE DOE IN  
SUPPORT OF HER MOTION FOR A  
PRELIMINARY INJUNCTION AND HER  
AND HELEN AND JAMES DOE'S  
MOTION TO PROCEED UNDER A  
PSEUDONYM**

20  
21  
22  
23  
24  
25  
26  
27  
28

1 Jyotin Hamid\*  
Justin R. Rassi\*  
2 Amy C. Zimmerman\*  
DEBEVOISE & PLIMPTON LLP  
3 66 Hudson Boulevard  
New York, New York 10001  
4 Telephone: (212) 909-6000  
Facsimile: (212) 909-6836  
5 Email: jhamid@debevoise.com  
Email: jrassi@debevoise.com  
6 Email: azimmerman@debevoise.com

7 Amy Whelan\*  
Rachel Berg\*  
8 NATIONAL CENTER FOR LESBIAN RIGHTS  
870 Market Street, Suite 370  
9 San Francisco, California 94102  
Telephone: (415) 343-7679  
10 Facsimile: (415) 392-8442  
Email: awhelan@nclrights.org  
11 Email: rberg@nclrights.org

12 *\*Pro hac vice application forthcoming*

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 I, Jane Doe, declare as follows:

2 1. I am 11 years old and will be starting middle school in the Kyrene School  
3 District in July. I am a transgender girl.

4 2. I have always known I am a girl. My parents have told me that I would tell  
5 them I was a girl when I was only a few years old. My parents have always supported me.

6 3. When I was in Kindergarten, I wore a dress to school for the first time. The  
7 first time, people made fun of me, but I decided to wear one again anyway, and I have  
8 dressed in a way that reflects who I am (a girl) since then..

9 4. I live as who I am (a girl) in all parts of my life, including at school.

10 5. Sports are really important to me and my parents.

11 6. I especially love soccer and have been playing soccer as long as I can  
12 remember. I hope I can play soccer for the rest of my life.

13 7. Playing soccer has helped me make friends and being part of a team makes  
14 me feel like I belong.

15 8. I have played club soccer on a girls' team with some of my friends for  
16 almost five years, and I am hoping that I can play with some of them on the school team.  
17 We are all excited about it.

18 9. When I start middle school in July, I am excited to try out for the girls'  
19 soccer team, the cross-country team, and the girls' basketball team. Both the soccer and  
20 basketball teams have separate teams for boys and girls. The cross-country team trains  
21 together, but boys and girls compete separately. The cross-country team starts in mid-July  
22 of this year.

23 10. Because of the Arizona law that passed about transgender girls playing  
24 sports, I am really afraid I will not be able to play on the girls' team for soccer or  
25 basketball or get to compete with other girls as part of the cross-country team.

