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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
16 Instruction; Laura Toenjes, in her official
capacity as Superintendent of the Kyrene
17 School District; Kyrene School District;
The Gregory School; and Arizona
18 Interscholastic Association Inc.,

19 Defendants.
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Case No. _____

**DECLARATION OF MEGAN ROE IN
SUPPORT OF HER MOTION FOR A
PRELIMINARY INJUNCTION AND HER
AND KATE AND ROBERT ROE'S
MOTION TO PROCEED UNDER A
PSEUDONYM**

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12 **Pro hac vice application forthcoming*

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1 I, Megan Roe, declare as follows:

2 1. I make this declaration of my own personal knowledge, and, if called as
3 witness, could and would testify competently to the matters stated here.

4 2. I am 15 years old and I am a transgender girl.

5 3. Ever since I was really young, I knew I was a girl. I transitioned when I was
6 seven years old with the support of my parents. My friends have always mostly been
7 girls.

8 4. Sports has always been a part of my life. When I was in elementary school,
9 I swam on the JCC swim team, and I used to also like to dance.

10 5. Before I started at The Gregory School, my parents shared with the school
11 that I am a transgender girl, and everyone there has been very supportive.

12 6. When I was 11 years old, my doctor gave me medicine that stops me from
13 going through puberty. I have taken that medicine ever since. When I was 12 years old,
14 my doctor gave me hormone medication, which I continue to take.

15 7. I would really like to try out for the girls' volleyball team at my school this
16 year. A lot of my friends are on the team, and I am excited to play on the volleyball team
17 with them.

18 8. One of the reasons I want to join the team is because it's a really important
19 part of our community. A lot of kids show up for the school volleyball games, and I want
20 to be a part of that. I'm also excited to make new friends.

21 9. Because of the Arizona law banning transgender girls from playing on
22 girls' sports teams, I am afraid I will not be able to play on the girls' team. I cannot play
23 for the boys' team because I am a girl. I would feel embarrassed and humiliated if I had
24 to play on a team where I know I do not belong. I know that some kids do not get to play
25 on teams because there may not be enough spots. But that is very different from telling
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1 me and all other transgender girls that we are never welcome and can never play on teams
2 with our friends.

3 10. I am also afraid that because of the law, other people at school and in
4 Arizona will think it is okay to target transgender people.

5 11. I do not want to use my real name or initials as part of this lawsuit. Even
6 though my parents and school have been supportive, I still want to control private
7 information about my life. I am also worried about facing harassment and ridicule for
8 being a part of this case.

9 12. I would also like my parents to be able to use pseudonyms. I believe that if
10 my parents' identities are public, the public could determine my identity as well. I also do
11 not want my family to face any harassment.

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13 This declaration was executed this 12th day of April, 2023, in Pima County,
14 Arizona.

15 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
16 is true and correct.

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18 By: Megan Roe

19 Megan Roe
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