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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 Roe,  
11 by her next friend and parents, Kate Roe and  
Robert Roe,

12 Plaintiffs,

13 v.

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

19 Defendants.

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

**DECLARATION OF KATE ROE IN  
SUPPORT OF MEGAN ROE'S  
MOTION FOR A PRELIMINARY  
INJUNCTION AND HER AND MEGAN  
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, Kate 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 the mother of Megan Roe, one of the plaintiffs in this case. My  
5 husband, Robert Roe, is Megan's father.

6 3. Megan has always known she was a girl. She was always uncomfortable  
7 with the gender she was told she had, and told us she was a girl by the time she was three.  
8 She was quite consistent and persistent on this fact.

9 4. Megan has always been friends primarily with other girls. She transitioned  
10 between first and second grade, and it was a fairly seamless transition. We love our child  
11 and will support her in every way that we can.

12 5. Megan has been living as a girl since she was very young. Her school,  
13 coaches, and friends have been very supportive of her.

14 6. Megan was formally diagnosed with gender dysphoria at the age of 10. As  
15 part of her medical treatment, she has been taking puberty blockers since she was 11,  
16 which prevented her from undergoing male puberty. She also began hormone therapy  
17 when she was 12 years old.

18 7. Megan began playing sports right after she socially transitioned, when she  
19 was about seven years old. She joined a swim team, and the coach was supportive of  
20 Megan and her gender identity.

21 8. Megan is excited to play on the girls' volleyball team at The Gregory  
22 School. Volleyball is a very social and competitive sport at Megan's school. A lot of  
23 students show up for the games and there is a big community surrounding the sport.  
24 Megan hopes to try out and play on the team with her friends.

25 9. The Arizona law barring transgender girls from playing on girls' teams is  
26 the first time Megan has faced a significant obstacle because she is transgender. It

1 saddens me that Megan must face this. No parent ever wants their kid to lose out on  
2 opportunities and experiences that can help them grow as people. Sports provide all kinds  
3 of benefits to kids, and it is very upsetting that they may be completely cut off for my  
4 child.

5 10. Playing and/or competing with boys would be harmful and painful for  
6 Megan and it is not something she would do. It would also directly conflict with her  
7 medical treatment for gender dysphoria because Megan's well-being depends on her  
8 ability to live and interact with others as a girl. Megan has lived as a girl for as long as  
9 she can remember. Playing and competing with boys is simply not an option for her.

10 11. Megan will be distraught if she cannot play on the girls' volleyball team  
11 this year.

12 12. We want Megan to proceed under a pseudonym so that she can maintain  
13 her privacy during this lawsuit. She is just a child and it scares me that there has been so  
14 much attention placed on transgender kids in recent years, and especially in Arizona  
15 because of this law. Megan also wants agency over who knows personal information  
16 about her, especially when it comes to members of the public. While many of her friends  
17 and teachers are supportive of Megan, we do not know how other people will treat her if  
18 they know her identity and that she is a part of the lawsuit.

19 13. I also ask to proceed under a pseudonym, along with my husband Robert  
20 Roe, because using our full names would identify Megan as well. Our identities could  
21 quite easily be linked to Megan, especially given that Megan and Robert share a last  
22 name. Further, using our real names could expose our family to harassment from being  
23 part of this lawsuit. For those reasons, we request that the Court allow us to use  
24 pseudonyms in this case.

