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10 *Additional counsel listed in signature block*

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF ARIZONA**  
13 **TUCSON DIVISION**

14 Jane Doe, by her next friend and parents  
15 Helen Doe and James Doe; and Megan Roe,  
16 by her next friend and parents, Kate Roe and  
17 Robert Roe,

18 Plaintiffs,

19 v.

20 Thomas C. Horne in his official capacity as  
21 State Superintendent of Public Instruction;  
22 Laura Toenjjes, in her official capacity as  
23 Superintendent of the Kyrene School  
24 District; Kyrene School District; The  
25 Gregory School; and Arizona Interscholastic  
26 Association Inc.,

27 Defendants.

Case No. 4:23-cv-00185-JGZ

**PLAINTIFFS' MOTION TO FILE  
SUPPLEMENTAL EXHIBIT TO  
PLAINTIFFS' EXHIBIT LIST FOR  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

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1 Plaintiffs respectfully move this Court for leave to file the Third Declaration of  
2 Helen Roe, attached hereto, as Exhibit 26 to Plaintiffs' Exhibit List for Plaintiffs' Motion  
3 for Preliminary Injunction. (Dkt. 88).

4 Plaintiffs have good cause to file this supplemental exhibit as the facts described  
5 in the Third Declaration of Helen Roe occurred only within the last 3 business days, and  
6 Plaintiffs' counsel were only informed of these facts last night.

7 WHEREFORE, Plaintiffs respectfully request that the Court enter an order  
8 granting Plaintiffs leave to file the attached Third Declaration of Helen Roe as Exhibit 26  
9 to Plaintiffs' Exhibit List for Plaintiffs' Motion for Preliminary Injunction.

10  
11 Respectfully submitted this 30<sup>th</sup> day of June,  
12 2023.

13 */s/ Colin M. Proksel*  
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6 *Attorney for Plaintiffs*

7 *Additional counsel listed on following page*

8 **UNITED STATES DISTRICT COURT**  
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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,  
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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. 4:23-cv-00185-JGZ

**THIRD DECLARATION OF HELEN DOE  
IN SUPPORT OF JANE DOE'S MOTION  
FOR A PRELIMINARY INJUNCTION**

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12 \*Admitted pro hac vice.

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1 I, Helen Doe, declare as follows:

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

4 2. I am the mother of Jane Doe, one of the plaintiffs in this case. My husband,  
5 James Doe, is Jane's father.

6 3. As I indicated in my first declaration, Jane has been monitored by her  
7 doctor for signs of the onset of puberty as part of her medical treatment for gender  
8 dysphoria.

9 4. At an appointment on June 27, 2023, Jane's doctor prescribed a Supprelin  
10 implant, which is a puberty-blocking medication, so that Jane does not go through male  
11 puberty.

12 5. After receiving insurance authorization, we will schedule Jane to have the  
13 implant procedure as soon as possible.

14  
15 This declaration was executed this 30th day of June, 2023, in Maricopa County,  
16 Arizona.

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

19  
20 By: Helen Doe

21 Helen Doe  
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