

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams, *et al.*,

*Plaintiffs,*

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter, *et al.*,

*Defendants.*

Civil No. 3:23-cv-00376

**Judge Richardson**

**Judge Newbern**

**DECLARATION OF REBECCA ROE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, REBECCA ROE, pursuant to 28 U.S.C §1746, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration and could and would testify competently to those facts if called as a witness.
2. On July 1, 2023, the law prohibiting transgender adolescents like my son from accessing gender affirming health care is set to go into effect.
3. Though the law allows for providers to wean patients off current medications between July 1, 2023, and March 31, 2024, we were informed by Ryan's medical providers at Vanderbilt University that they will be discontinuing treatment beginning on July 1, 2023 because of the law.
4. The only provider that I am aware of in the state that will continue treatment of transgender adolescents with gender dysphoria between July 1, 2023 and March 31, 2024 is CHOICES in Memphis. But CHOICES only treats adolescent patients with gender dysphoria

beginning at age 16. Ryan is only 15 years old. I called CHOICES to see if we could get an appointment with them but Ryan is too young and his 16<sup>th</sup> birthday is too far off for CHOICES to even schedule a future appointment.

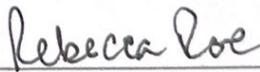
5. With care being cut-off at Vanderbilt on July 1<sup>st</sup> as a result of the law and Ryan's 16<sup>th</sup> birthday not until October, there are no in-state options for treatment for my son.

6. I have spent hours researching and calling clinics in other states to try and get an appointment for Ryan. I have set up two appointments for Ryan for treatment for his gender dysphoria out of state for June. One appointment is in Asheville, North Carolina and the other is in Cincinnati, Ohio. Asheville is 4.5 hours by car each way and Cincinnati is 4 hours by car each way. We are preparing to potentially spend 8-9 hours driving for each appointment to access treatment for Ryan. This will mean missing work and school and driving long distances, potentially waiting overnight and missing additional time at work and in school. Disrupting Ryan's treatment is not an option, however, which means that we will have to make these sacrifices if the law is allowed to take effect.

7. I am worried that if Ohio or North Carolina pass similar laws, we will have to travel even further to access treatment and at greater expense. Though the Asheville Clinic has a sliding scale model for payment, I am not sure how we will afford treatment at the Ohio clinic in the long-term. We are already experiencing the emotional and financial burdens resulting from the law and are concerned about the future impact of this ongoing travel.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 5/28/23

  
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REBECCA ROE

**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2023, the undersigned filed the foregoing document via this Court’s electronic filing system, which sent notice of such filing to the following counsel of record:

<p>Steven J. Griffin Clark L. Hildabrand Trenton Meriwether Ryan N. Henry Brooke A. Huppenthal Office of the Tennessee Attorney General P.O. Box 20207 Nashville, Tennessee 3720 (615) 741-959 steven.griffin@ag.tn.gov clark.hildabrand@ag.tn.gov trenton.meriwether@ag.tn.gov ryan.henry@ag.tn.gov brooke.huppenthal@ag.tn.gov</p>	<p>Adam K. Mortara Lawfair LLC 40 Burton Hills Blvd., Suite 200 Nashville, TN 37215 (773) 750-7154 mortara@lawfairllc.com</p> <p>Cameron T. Norris (BPR# 33467) Consovoy McCarthy PLLC 1600 Wilson Blvd., Suite 700 Arlington, VA 22209 (703) 243-9423 cam@consovoymccarthy.com</p>
<p>Coty Montag Tamica Daniel Gloria Yi Alyssa C. Lareau United States Department of Justice Federal Coordination and Compliance Section 950 Pennsylvania Avenue NW – 4CON Washington, DC 20530 (202) 305-2994 Coty.Montag@usdoj.gov Tamica.Daniel@usdoj.gov Gloria.Yi@usdoj.gov Alyssa.Lareau@usdoj.gov</p>	<p>Ellen Bowden McIntyre Rascoe S. Dean U.S. Attorney’s Office (Nashville) 719 Church Street Suite 3300 Nashville, TN 37203 (615) 736-2125 (615) 401-6626 (fax) ellen.bowden2@usdoj.gov rascoe.dean@usdoj.gov</p>

*s/ Stella Yarbrough* \_\_\_\_\_  
Stella Yarbrough, BPR No. 033637  
ACLU Foundation of Tennessee  
P.O. Box 120160  
Nashville, TN 37212  
Tel.: 615-320-7142  
syarbrough@aclu-tn.org