

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

JANE DOE, et al.,

Plaintiffs,

vs.

Case No. 4:23-cv-00114-RH-MAF

JOSEPH A. LADAPO, et al.,

Defendants.

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PLAINTIFFS' RULE 26(a)(3) PRETRIAL DISCLOSURES

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and this Court's Scheduling Order dated September 11, 2023 (ECF 150)¹, Plaintiffs hereby make their Rule 26(a)(3) disclosures. The following disclosures are based on a trial on the claims of Class 1 Plaintiffs only, pending stipulation by the parties.

1. Witness List.

Witness	Will Call	May Call	Deposition
Jane Doe	X		

¹ Plaintiffs filed an Agreed Motion and Proposed Order for Leave to Amend the Case Schedule on September 21, 2023 (ECF 155), requesting to extend the deadline for pretrial disclosures under Rule 26(a)(3) to October 12, 2023. The Court granted the Motion during a telephonic motion hearing on October 4, 2023 (ECF 161).

Brenda Boe		X	
Carla Coe		X	
Fiona Foe		X	
Gloria Goe	X		
Patricia Poe		X	
Lucien Hamel		X	
Olivia Noel		X	
Dr. Brittany Bruggeman	X		
Dr. Vernon Langford		X	
Dr. Kenneth Goodman		X	
Dr. Aron Janssen		X	
Dr. Dan H. Karasic		X	
Dr. Loren Schecter		X	
Dr. Daniel Shumer		X	
Danielle Terrell, Executive Director of the Florida Board of Osteopathic Medicine		X	
Paul Vazquez, Executive Director of the Florida Board of Medicine		X	
Records Custodian		X	
Dr. Monica Mortensen		X	

2. Exhibit List.

Plaintiffs reserve the right to use additional documents for purposes of impeachment. Plaintiffs also reserve the right to offer any exhibit identified by Defendants. The designation of an exhibit as “may use” does not necessarily mean that Plaintiffs concede that the exhibit is admissible if offered by Defendants.

Trial Ex. No.	Bates No.	Exhibit Description	Will Use	May Use	Stipulated/ Defendants’ Objections
<i>Dekker Exhibits</i>		Any exhibit that was entered into evidence in the <i>Dekker</i> trial		X	
Doe Pls’ Trial Ex. 1		Defendants’ Response to Pls’ First Set of Interrogatories		X	
Doe Pls’ Trial Ex. 2		Expert Report of Dr. Aaron Janssen, M.D. – 8/16/2023		X	
Doe Pls’ Trial Ex. 3		Expert Report of Dr. Brittany Bruggeman, M.D. – 8/16/2023		X	
Doe Pls’ Trial Ex. 4		Expert Report of Dr. Dan H. Karasic, M.D. – 8/16/2023		X	
Doe Pls’ Trial Ex. 5		Expert Report of Dr. Daniel Shumer, M.D. – 8/16/2023		X	
Doe Pls’ Trial Ex. 6		Expert Report of Dr. Loren Schechter, M.D. – 8/16/2023		X	
Doe Pls’ Trial Ex. 7		Expert Report of Dr. Vernon Langford, DNP, APRN-CNP, FNP-C – 8/16/2023		X	

Doe Pls' Trial Ex. 8		Expert Report of Dr. Kenneth W. Goodman, PhD, FACMI, FACE – 8/16/2023		X	
Doe Pls' Trial Ex. 9		Expert Rebuttal Report of Dr. Aaron Janssen, M.D. – 9/5/2023		X	
Doe Pls' Trial Ex. 10		Expert Rebuttal Report of Dr. Dan H. Karasic – 9/5/2023		X	
Doe Pls' Trial Ex. 11		Florida Admin. Code R. 64B8-9.019, <i>Standards of Practice for the Treatment of Gender Dysphoria in Minors</i> (effective March 16, 2023)	X		
Doe Pls' Trial Ex. 12		Florida Admin. Code R. 64B15-14.014, <i>Standards of Practice for the Treatment of Gender Dysphoria in Minors</i> (effective March 28, 2023)	X		
Doe Pls' Trial Ex. 13		Notice of Change, Fla Admin Code R. 64B15-14.014, <i>Standards of Practice for the Treatment of Gender Dysphoria in Minors</i> (filed February 10, 2023)		X	
Doe Pls' Trial Ex. 14		Florida Department of Health Guidance, <i>Treatment of Gender Dysphoria for Children and Adolescents</i> (April 20, 2022)	X		
Doe Pls' Trial Ex. 15		Surgeon General Ladapo Letter to Florida Boards of Medicine (June 2, 2022)	X		

Doe Pls' Trial Ex. 16		Florida Department of Health Petition to Initiate Rulemaking Setting the Standard of Care for the Treatment of Gender Dysphoria (July 28, 2022)	X		
Doe Pls' Trial Ex. 17		Florida Senate Bill 254 (2023)	X		
Doe Pls' Trial Ex. 18		Florida House Bill 1421 (2023)	X		
Doe Pls' Trial Ex. 19		Section 456.001(1)(8) – (9), Florida Statutes (2023)		X	
Doe Pls' Trial Ex. 20		Section 456.52, Florida Statutes (2023)		X	
Doe Pls' Trial Ex. 21		Rulemaking Record – Produced by Defendants	X		
Doe Pls' Trial Ex. 22		Public Book 02.10.2023 - Produced by Defendants	X		
Doe Pls' Trial Ex. 23	Med Def_001485- 001622	Transcript of Florida Board of Medicine Meeting 08.05.2022	X		
Doe Pls' Trial Ex. 24	Med Def_001058– 001349	Transcript of Florida Boards' Joint Rule Workshop 10.28.2022	X		
Doe Pls' Trial Ex. 25	Med Def_000876- 001016	Transcript of Florida Boards' Joint Meeting 11.04.2022		X	
Doe Pls' Trial Ex. 26	Med Def_001017– 001043	Transcript of Florida Boards' Joint Public Hearing 02.10.2023		X	

Doe Pls' Trial Ex. 27	Med Def_001350- 001484	Transcript of Florida House HHS Committee Meeting 02.21.2023	X		
Doe Pls' Trial Ex. 28	Med Def_002232 - 002234	Excerpt from Speech of Governor Ron DeSantis – Joint Session 03.07.2023		X	
Doe Pls' Trial Ex. 29	Med Def_000087- 000250	Transcript of Florida Senate Health Policy Committee Meeting 03.13.2023		X	
Doe Pls' Trial Ex. 30	Med Def_002235 - 002335	Transcript of Florida House Healthcare Regulation Subcommittee Meeting 03.22.2023		X	
Doe Pls' Trial Ex. 31	Med Def_001913- 002001	Transcript of Florida Senate Fiscal Policy Committee Meeting 03.23.2023		X	
Doe Pls' Trial Ex. 32	Med Def_002336 - 002461	Transcript of Florida House HHS Committee Meeting 03.27.2023		X	
Doe Pls' Trial Ex. 33	Med Def_002462 - 002571	Transcript of Florida Senate General Session 04.03.2023		X	
Doe Pls' Trial Ex. 34	Med Def_002002- 002028	Transcript of Florida Senate General Session 04.04.2023		X	
Doe Pls' Trial Ex. 35	Med Def_002029 – 002144	Transcript of Florida House General Session 04.18.2023		X	
Doe Pls' Trial Ex. 36	Med Def_002145	Transcript of Florida House General Session 04.19.2023		X	
Doe Pls' Trial Ex. 37	Med Def_002215 - 002231	Transcript of Florida Senate General Session 05.04.2023		X	

Doe Pls' Trial Ex. 38	Med Def_002193 - 002214	Transcript of Florida House General Session 05.04.2023		X	
Doe Pls' Trial Ex. 39	Med Def_001623 – 001912	Transcript of Florida Boards' Joint Meeting 06.23.2023		X	
Doe Pls' Trial Ex. 40	Med Def_000251 - 000454	Transcript of Florida Boards' Joint Public Meeting 06.30.2023		X	
Doe Pls' Trial Ex. 41	Med Def_000001- 000086	Transcript of Florida Boards' Joint Meeting 08.03.2023		X	
Doe Pls' Trial Ex. 42	FDOH_0000 44095- 000044100; 000044010– 000044014; 000042401- 000043407; 000044022- 000044026; 000044081- 000044086; 000042389- 000042398.	Emails between Board of Osteopathic Medicine Executive Director Danielle Terrell and Vernadette Broyles (Oct. 25-28, 2022)	X		
Doe Pls' Trial Ex. 43	FDOH_00006 5015- 000065016	Emails from Board of Osteopathic Medicine Executive Director Terrell (Nov, 7, 2022)		X	
Doe Pls' Trial Ex. 44	FDOH_00005 8615- 000058616	Gender Dysphoria Roundtable (July 8, 2022)	X		

Doe Pls' Trial Ex. 45	FDOH_00287 4150- 002874157	Governor Talking Points		X	
Doe Pls' Trial Ex. 46	FDOH_00006 5735- 000065778	Request for Hearing to Board of Medicine		X	
Doe Pls' Trial Ex. 47	FDOH_00003 8015- 000038019	Open Letter to the Florida Board of Medicine (9.23.22)	X		
Doe Pls' Trial Ex. 48	EOG_005121 - 005156	FDOH Updates (4.8.22)		X	
Doe Pls' Trial Ex. 49	FDOH_00006 4667- 000064671	Emails between Board of Medicine Executive Director Paul Vazquez and Dr. Laidlaw (10.14.22- 10.25.22)		X	
Doe Pls' Trial Ex. 50	EOG_000849 -000864	Governor Talking Points (5.13.22)		X	
Doe Pls' Trial Ex. 51	FDOH_00003 9058	Emails between Board of Medicine Paul Vazquez and Dr. Patrick Hunter (10.16.22)		X	
Doe Pls' Trial Ex. 52	FDOH_00190 00113	Emails between Dr. Van Mol Dr. Patrick Hunter (9.14.22)		X	
Doe Pls' Trial Ex. 53	FDOH_00003 0412	Email between Vazquez and Hunter (9.14.22)		X	
Doe Pls' Trial Ex. 54	FDOH_00003 0376- 000030377	Emails between Vazquez and Hunter (9.13.22)		X	
Doe Pls' Trial Ex. 55	FDOH_00003 0366-30369	Email between Hunter and Vazquez (9.12.22)		X	

Doe Pls' Trial Ex. 56	EOG_000519 -000520	Gender Affirming Guidance Event		X	
Doe Pls' Trial Ex. 57	EOG_000667 -000682	Governor DeSantis Interview Transcript (4.28.22)		X	
Doe Pls' Trial Ex. 58	Def_0002867 09	AHCA Invoice for Dr. Van Meter attendance at Board of Medicine Meeting (8.11.22)	X		
Doe Pls' Trial Ex. 59	EOG_008128 -008235	Memo on Gender Dysphoria Legislation	X		
Doe Pls' Trial Ex. 60	EOG_008125 -008127	Email from Maureen Furino with attachments (1.6.23)		X	
Doe Pls' Trial Ex. 61	EOG_005282 - 005284	Email from Savannah Kelly Jefferson with attachment (6.29.22)		X	
Doe Pls' Trial Ex. 62	EOG_005157 - 005250	Alliance Defending Freedom Binder		X	
Doe Pls' Trial Ex. 63	EOG_ 004414, 004636- 004640, 004487- 004492	Briefers – Safeguarding Kids from Gender Surgeries and Drugs		X	
Doe Pls' Trial Ex. 64	FDOH_00003 5598	Email from Board of Osteopathic Medicine Executive Director Danielle Terrell to Bettye Strickland (10.19.22)		X	
Doe Pls' Trial Ex. 65	FDOH_00004 0582 – 000040599	Email from Patrick Hunter to Paul Vazquez (10.23.22)		X	

Doe Pls' Trial Ex. 66	FDOH_00004 5008 - 000045010	Appearance Request Form (11.2.22)		X	
Doe Pls' Trial Ex. 67	FDOH_00003 4212 - 000034214, Att. FDOH_00003 4022 - 000034111	Email from Vazquez to Strickland (9.27.22)		X	
Doe Pls' Trial Ex. 68	FDOH_00006 9398 - 000061417	Phillip Penna comment (9.19.22)		X	
Doe Pls' Trial Ex. 69	FDOH_00001 7897- 000017908	Email from Jeremy Redford (7.10.22)		X	
Doe Pls' Trial Ex. 70		Public Book 8.3.23 – Produced by Defendants	X		
Doe Pls' Trial Ex. 71	FDOH_00004 0530 - 000040542	Email from Hunter to Vazquez (10.22.22)		X	
Doe Pls' Trial Ex. 72	FDOH_00003 9931 - 000039932	Email from Vazquez to Strickland (10.18.22)		X	
Doe Pls' Trial Ex. 73	FDOH_00003 7928	September 30, 2022 Rule Workshop Agenda (9.30.22)		X	
Doe Pls' Trial Ex. 74	FDOH_00004 0020	Original October 28, 2022 Workshop Agenda (10.28.22)		X	
Doe Pls' Trial Ex. 75	FDOH_00003 5446 - 000035448	Email from Vazquez to Diamond (10.14.22)		X	

Doe Pls' Trial Ex. 76	FDOH_00002 8162 - 000028163; FDOH_00006 4956; and FDOH_00006 5030	Emails from Senate Committee on Health Policy		X	
Doe Pls' Trial Ex. 77	FDOH_00003 9513 - 000039516	Emails between Dr. Dayton and Paul Vazquez (10.18.22)		X	
Doe Pls' Trial Ex. 78	FDOH_00003 5604- 000035604	Email from Board of Osteopathic Medicine Danielle Terrell (10.19.22)		X	
Doe Pls' Trial Ex. 79	FDOH_00003 9521 - 000039522	Email from Paul Vazquez to Danielle Terrell (10.18.22)		X	
Doe Pls' Trial Ex. 80		Plaintiff Susan Doe Medical Records (SEALED)	X		
Doe Pls' Trial Ex. 81		Plaintiff Gavin Goe Medical Records (SEALED)	X		
Doe Pls' Trial Ex. 82		Plaintiff Lucien Hamel Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 83		Plaintiff Olivia Noel Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 84		Plaintiff Lisa Loe Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 85		Plaintiff Kai Pope Medical Records (SEALED)		X	

Doe Pls' Trial Ex. 86		Plaintiff Rebeca Cruz Evia Medical Records (SEALED)		X	
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Respectfully submitted, this 12th day of October, 2023.

By: /s/ Simone Chriss
Simone Chriss
Counsel for Plaintiffs

SOUTHERN LEGAL COUNSEL

By: /s/ Simone Chriss

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CERTIFICATE OF SERVICE

I hereby certify that, on October 12, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

/s/ Simone Chriss
Simone Chriss