

**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.

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

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and this Court's Order Confirming the Amended Schedule dated October 23, 2023 (ECF 169), Plaintiffs hereby make their Rule 26(a)(3) disclosures. The following amended disclosures are based on a trial on the claims of all Plaintiffs.¹

¹ Plaintiffs filed their Rule 26(a)(3) Disclosures on October 12, 2023 (ECF 164), pursuant to the Agreed Motion for Leave to Amend the Case Schedule (ECF 155), and as granted by this Court during a telephonic motion hearing on October 4, 2023 (ECF 161), and by Order (ECF 169). Plaintiffs' Rule 26(a)(3) Disclosures were based upon an anticipated stipulation between the parties to proceed to trial on the claims of Class 1 Plaintiffs only. (ECF 164, at p. 1). Accordingly, Plaintiffs submit the following Amended Rule 26(a)(3) Disclosures.

1. Witness List.

Witness	Will Call	May Call	Deposition
Jane Doe	X		
Brenda Boe		X	
Carla Coe		X	
Fiona Foe		X	
Gloria Goe	X		
Lisa Loe		X	
Patricia Poe		X	
Lucien Hamel		X	
Olivia Noel		X	
Kai Pope		X	
Rebecca Cruz-Evia		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	
Florida Representative Randy Fine		X	
Dr. Patrick Hunter, Board of Medicine		X	
Records Custodian		X	
Dr. Monica Mortensen			X ²
Dr. Sven Roman			X ³

2. Designation of Deposition Testimony.

A. Deposition Designations of Dr. Monica Mortensen taken September 28, 2023

Page:Line

102:10-104:18

108:5-110:14

116:3-21

120:7-123:23

127:2-16

² Plaintiffs will enter the designated portions of Dr. Mortensen's deposition transcript dated September 28, 2023 if Defendants do not call her to testify.

³ Plaintiffs will enter the designated portions of Dr. Roman's deposition transcript dated October 9, 2023 if Defendants do not call him to testify.

128:8-133:14

141:13 – 149:19

152:3-154:10

155:4-11

165:7-17

174:22 – 175:13

176:20-178:9

186:20-187:21

190:9 – 193:1

196:10-198:17

206:12-207:21

209:20- 211:1

220:6-221:7

226:15-22

234:13-239:11

250:15-22

257:16-22

B. Deposition Designations of Dr. Sven Roman taken October 9, 2023

Page:Line

18:7-23:11

61:3-24

63:19-65:13

66:4-72:25

222:11-224:6

3. 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	PL000566 - 000579	Defendants' Response to Pls' First Set of Interrogatories		X	
Doe Pls' Trial Ex. 2	PL000580 - 000625	Expert Report of Dr. Aaron Janssen, M.D. (8.16.2023)		X	
Doe Pls' Trial Ex. 3	PL000626- 000683	Expert Report of Dr. Brittany Bruggeman, M.D. (8.16.2023)		X	
Doe Pls' Trial Ex. 4	PL000684- 000735	Expert Report of Dr. Dan H. Karasic, M.D. (8.16.2023)		X	

Doe Pls' Trial Ex. 5	PL000736 – 000816	Expert Report of Dr. Daniel Shumer, M.D. (8.16.2023)		X	
Doe Pls' Trial Ex. 6	PL000817 – 000886	Expert Report of Dr. Loren Schechter, M.D. (8.16.2023)		X	
Doe Pls' Trial Ex. 7	PL000887 - 000910	Expert Report of Dr. Vernon Langford, DNP, APRN-CNP, FNP-C (8.16.2023)		X	
Doe Pls' Trial Ex. 8	PL000911 - 000929	Expert Report of Dr. Kenneth W. Goodman, PhD, FACMI, FACE (8.16.2023)		X	
Doe Pls' Trial Ex. 9	PL000930 - 000938	Expert Rebuttal Report of Dr. Aaron Janssen, M.D. (9.5.2023)		X	
Doe Pls' Trial Ex. 10	PL000939 - 000946	Expert Rebuttal Report of Dr. Dan H. Karasic (9.5.2023)		X	
Doe Pls' Trial Ex. 11	PL000947	Florida Admin. Code R. 64B8-9.019, <i>Standards of Practice for the Treatment of Gender Dysphoria in Minors</i> (effective 3.16.2023)	X		
Doe Pls' Trial Ex. 12	PL000948	Florida Admin. Code R. 64B15-14.014, <i>Standards of Practice for the Treatment of Gender Dysphoria in Minors</i> (effective 3.28.2023)	X		
Doe Pls' Trial Ex. 13	PL000949	Notice of Change, Fla Admin Code R. 64B15-14.014 (filed 2.10.2023)		X	
Doe Pls' Trial Ex. 14	PL000950	Florida Department of Health Guidance, <i>Treatment of Gender Dysphoria for Children</i>	X		

		<i>and Adolescents (4.20.22)</i>			
Doe Pls’ Trial Ex. 15	PL000951	Surgeon General Ladapo Letter to Florida Boards of Medicine (6.2.22)	X		
Doe Pls’ Trial Ex. 16	PL000952 - 000959	Florida Department of Health Petition to Initiate Rulemaking Setting the Standard of Care for the Treatment of Gender Dysphoria (7.28.22)	X		
Doe Pls’ Trial Ex. 17	PL000960 – 000969	Florida Senate Bill 254 (2023)	X		
Doe Pls’ Trial Ex. 18	PL000970 - 000979	Florida House Bill 1421 (2023)	X		
Doe Pls’ Trial Ex. 19	PL000980 - 000981	Section 456.001(1)(8) – (9), Florida Statutes (2023)		X	
Doe Pls’ Trial Ex. 20	PL000982 - 000983	Section 456.52, Florida Statutes (2023)		X	
Doe Pls’ Trial Ex. 21	PL000984 - 001462	Rulemaking Record (Produced by Defendants)	X		
Doe Pls’ Trial Ex. 22	PL001463 - 008066	Public Book for 02.10.2023 Joint Hearing (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 (*Incomplete at present)		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.	Composite Exhibit - Emails between Board of Osteopathic Medicine Executive Director Danielle Terrell and Vernadette Broyles (Oct. 25-28, 2022)	X		
Doe Pls' Trial Ex. 43	FDOH_0000 65015- 000065016	Emails from Board of Osteopathic Medicine Executive Director Terrell (11.07.22)		X	

Doe Pls' Trial Ex. 44	FDOH_0000 58615- 000058616	Gender Dysphoria Roundtable (7.8.22)	X		
Doe Pls' Trial Ex. 45	FDOH_0028 74150- 002874157	Governor Talking Points		X	
Doe Pls' Trial Ex. 46	FDOH_0000 65735- 000065778	Request for Hearing to Board of Medicine		X	
Doe Pls' Trial Ex. 47	FDOH_0000 38015- 000038019	Open Letter to the Florida Board of Medicine (9.23.22)	X		
Doe Pls' Trial Ex. 48	EOG_00512 1- 005156	FDOH Updates (4.8.22)		X	
Doe Pls' Trial Ex. 49	FDOH_0000 64667- 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_00084 9-000864	Governor Talking Points (5.13.22)		X	
Doe Pls' Trial Ex. 51	FDOH_0000 39058	Emails between Board of Medicine Paul Vazquez and Dr. Patrick Hunter (10.16.22)		X	
Doe Pls' Trial Ex. 52	FDOH_0019 000113	Emails between Dr. Van Mol Dr. Patrick Hunter (9.14.22)		X	
Doe Pls' Trial Ex. 53	FDOH_0000 30412	Email between Vazquez and Hunter (9.14.22)		X	
Doe Pls' Trial Ex. 54	FDOH_0000 30376- 000030377	Emails between Vazquez and Hunter (9.13.22)		X	

Doe Pls' Trial Ex. 55	FDOH_0000 30366-30369	Email between Hunter and Vazquez (9.12.22)		X	
Doe Pls' Trial Ex. 56	EOG_00051 9-000520	Gender Affirming Guidance Event		X	
Doe Pls' Trial Ex. 57	EOG_00066 7-000682	Governor DeSantis Interview Transcript (4.28.22)		X	
Doe Pls' Trial Ex. 58	Def_000286 709	AHCA Invoice for Dr. Van Meter attendance at Board of Medicine Meeting (8.11.22)	X		
Doe Pls' Trial Ex. 59	EOG_00812 8-008235	Memo on Gender Dysphoria Legislation	X		
Doe Pls' Trial Ex. 60	EOG_00812 5-008127	Email from Maureen Furino with attachments (1.06.23)		X	
Doe Pls' Trial Ex. 61	EOG_00528 2- 005284	Email from Savannah Kelly Jefferson with attachment (6.29.22)		X	
Doe Pls' Trial Ex. 62	EOG_00515 7 - 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_0000 35598	Email from Board of Osteopathic Medicine Executive Director Danielle Terrell to Bettye Strickland (10.19.22)		X	

Doe Pls' Trial Ex. 65	FDOH_0000 40582 – 000040599	Email from Patrick Hunter to Paul Vazquez (10.23.22)		X	
Doe Pls' Trial Ex. 66	FDOH_0000 45008 - 000045010	Appearance Request Form (11.02.22)		X	
Doe Pls' Trial Ex. 67	FDOH_0000 34212 – 000034214, Att. FDOH_0000 34022 - 000034111	Email from Vazquez to Strickland (9.27.22)		X	
Doe Pls' Trial Ex. 68	FDOH_0000 69398 – 000061417	Phillip Penna comment (9.19.22)		X	
Doe Pls' Trial Ex. 69	FDOH_0000 17897- 000017908	Email from Jeremy Redford (7.10.22)		X	
Doe Pls' Trial Ex. 70	PL008067 - 010525	Public Book for 8.3.23 Joint Meeting (Produced by Defendants)	X		
Doe Pls' Trial Ex. 71	FDOH_0000 40530 - 000040542	Email from Hunter to Vazquez (10.22.22)		X	
Doe Pls' Trial Ex. 72	FDOH_0000 39931 – 000039932	Email from Vazquez to Strickland (10.18.22)		X	
Doe Pls' Trial Ex. 73	FDOH_0000 37928	September 30, 2022 Rule Workshop Agenda (9.30.22)		X	
Doe Pls' Trial Ex. 74	FDOH_0000 40020	Original October 28, 2022 Workshop Agenda (10.28.22)		X	

Doe Pls' Trial Ex. 75	FDOH_0000 35446 – 000035448	Email from Vazquez to Diamond (10.14.22)		X	
Doe Pls' Trial Ex. 76	FDOH_0000 28162 – 000028163; FDOH_0000 64956; and FDOH_0000 65030	Emails from Senate Committee on Health Policy (Composite)		X	
Doe Pls' Trial Ex. 77	FDOH_0000 39513 - 000039516	Emails between Dr. Dayton and Paul Vazquez (10.18.22)		X	
Doe Pls' Trial Ex. 78	FDOH_0000 35604- 000035604	Email from Board of Osteopathic Medicine Danielle Terrell (10.19.22)		X	
Doe Pls' Trial Ex. 79	FDOH_0000 39521 - 000039522	Email from Paul Vazquez to Danielle Terrell (10.18.22)		X	
Doe Pls' Trial Ex. 80	PL000022- 000048	Plaintiff Susan Doe Medical Records (SEALED)	X		
Doe Pls' Trial Ex. 81	PL000001 - 000015	Plaintiff Gavin Goe Medical Records (SEALED)	X		
Doe Pls' Trial Ex. 82	PL000366- 408; 000509- 565	Plaintiff Lucien Hamel Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 83	PL000418 - 000483	Plaintiff Olivia Noel Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 84	PL000016 - 000021	Plaintiff Lisa Loe Medical Records (SEALED)		X	

Doe Pls' Trial Ex. 85	PL000409-417; 000484-508	Plaintiff Kai Pope Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 86	PL000049 - 000365	Plaintiff Rebeca Cruz Evia Medical Records (SEALED)		X	
Doe Pls' Trial Ex. 87	FDOH_0000 35423 - 000035428	Emails between Hunter, Diamond, and Vazquez (10.04.22)		X	
Doe Pls' Trial Ex. 88	FDOH_0000 62034 - 000062035	Emails between Hunter and Vazquez (9.23.22)		X	
Doe Pls' Trial Ex. 89	FDOH_0000 61277 - 000061279	Emails between Hunter, Vazquez and Biggs (9.19.22)		X	
Doe Pls' Trial Ex. 90	FDOH_0000 30412	Email from Hunter to Vazquez (9.14.22)		X	
Doe Pls' Trial Ex. 91	PL010526 - 010528	Governor Ron DeSantis Appoints Four to the Board of Medicine (6.17.22)		X	
Doe Pls' Trial Ex. 92	PL010529-010530	Dr. Hunter article "Political Issues Surrounding Gender-Affirming Care for Transgender Youth" (JAMA Pediatr., December 20, 2021, doi:10.1001/jamapediatrics.2021.5348)		X	
Doe Pls' Trial Ex. 93	PL010531-011801	<i>Eknes-Tucker v. Ivey</i> , 2:22-cv-00184, ECF 69-6 (5.02.22)		X	
Doe Pls' Trial Ex. 94	PL011802-011804	Catholic Medical Association Resolutions 8-7 through 8-14		X	

Doe Pls' Trial Ex. 95	PL011805 - 001806	Catholic Medical Association 92 nd Annual Education Conference (9.18.23)		X	
Doe Pls' Trial Ex. 96	EOG_00812 5 - 008127	Email from Furino with texts attached (1.06.23)		X	
Doe Pls' Trial Ex. 97	PL011807 - 011811	AAP Resolution # 27		X	
Doe Pls' Trial Ex. 98	PL011812 - 011817	WSJ article "Youth Gender Transition Is Pushed Without Evidence" by Hunter, Roman, Kaltiala, Malone, etc. (7.13.23)		X	
Doe Pls' Trial Ex. 99	PL011818 - 011819	U.S. EO 12866 Meeting 0945-AA17 (4.25.22)		X	
Doe Pls' Trial Ex. 100	PL011820 - PL011825	SEGM "About Us" Page		X	
Doe Pls' Trial Ex. 101	PL011826 - 011827	"Challenges in Timing Puberty Suppression for Gender-Nonconforming Adolescents" (de Vries, 7.14.20)			
Doe Pls' Trial Ex. 102	PL011828 - 011830	Governor Ron DeSantis Appoints Three to the Board of Osteopathic Medicine (12.06.22)			
Doe Pls' Trial Ex. 103	PL011831 - 011833	Governor Ron DeSantis Appoints Two to the Board of Medicine (12.28.22)			
Doe Pls' Trial Ex. 104	PL011834 - 011857	NYT Article, Dr. Benson quoted (11.14.22)		X	

Doe Pls' Trial Ex. 105	PL011858 - 011866	Smalley, et al., <i>Improving Global Access to Transgender Health Care</i> , <i>Transgender Health</i> , Vol. 7, No. 2 (2022)		X	
Doe Pls' Trial Ex. 106	PL011867	Fla. Admin R. 64B8-30.008		X	
Doe Pls' Trial Ex. 107	PL011868	Fla. Admin. R. 64B8-30.012		X	
Doe Pls' Trial Ex. 108	PL011869 - 011871	Fla. Stat. 464.0123		X	
Doe Pls' Trial Ex. 109	PL011872 - 011874	Fla. Stat. 464.012		X	
Doe Pls' Trial Ex. 110	PL011875 - 011880	Fla. Stat. 458.347		X	
Doe Pls' Trial Ex. 111	PL011881	20 CFR 10.310		X	
Doe Pls' Trial Ex. 112	PL011882 - 011888	A Letter to Christian Physicians_CMDA Today		X	
Doe Pls' Trial Ex. 113	PL011889 - 0011890	Composite Exhibit (Jonathan Clemens Tweets)		X	
Doe Pls' Trial Ex. 114	PL011891 - 011938	FSU Student Handbook 2022-2023		X	
Doe Pls' Trial Ex. 115	PL011939 - 011948	Detransitioners in Your Church Doorway		X	
Doe Pls' Trial Ex. 116	PL011949 - 011973	Composite Exhibit – Tweets from Defendants and Lawmakers		X	

Doe Pls' Trial Ex. 117	PL01974 - 011975	SB 254 Amendment (350064 - Failed)		X	
Doe Pls' Trial Ex. 118	PL011976 - 011977	SB 254 Amendment (299002 - Failed)		X	
Doe Pls' Trial Ex. 119	PL011978 - 011979	SB 254 Amendment (212692 - Failed)		X	
Doe Pls' Trial Ex. 120	PL011980 - 011981	SB 254 Amendment (374289 - Failed)		X	
Doe Pls' Trial Ex. 121	PL011982 - 011996	SB 254 Amendment (256341) (and Failed Amndts to Amndt)		X	
Doe Pls' Trial Ex. 122	PL011997	SB 254 Amendment (388571 - Failed)		X	
Doe Pls' Trial Ex. 123	PL011998 - 012000	Dr. Hunter Letter to the Editor, JACCP, DOI: 10.1002/jac5.1691 (6.06.22)		X	
Doe Pls' Trial Ex. 124	Def_000177 905 - 000177906	Email from Jeremy Redfern re: Surgeon General Ladapo Meeting (7.10.22)		X	
Doe Pls' Trial Ex. 125	PL012001 - 012002	ALEC Legislative Membership List		X	

Respectfully submitted, this 24th day of October, 2023.

By: /s/ Simone Chriss
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Counsel for Plaintiffs

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By: /s/ Simone Chriss

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CERTIFICATE OF SERVICE

I hereby certify that, on October 24, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

/s/ Simone Chriss
Simone Chriss