

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

AUGUST DEKKER, et al.,

Plaintiffs,

v.

Case No. 4:22-cv-00325-RH-MAF

JASON WEIDA, et al.,

Defendants.

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THE STATE’S RULE 26(a)(3) DISCLOSURES

Under Federal Rule of Civil Procedure 26(a)(3) and the Court’s scheduling order, Doc.67, Defendants Secretary Weida and the Florida Agency for Health Care Administration (collectively, “the State”) make their Rule 26(a)(3) disclosures.

1. Witness List

The State expects to call, or may call, the following witnesses:

Witness	Will Call	May Call	Deposition
Matthew Brackett	X		
Ann Dalton	X		
Dr. Stephen Levine	X		
Dr. Paul Hruz	X		
Dr. Sophie Scott	X		
Dr. Patrick Lappert	X		
Dr. Kristopher Kaliebe	X		
Dr. Michael Laidlaw		X	
Dr. Quentin Van Meter		X	

Witness	Will Call	May Call	Deposition
Dr. Joseph Zanga		X	
Chloe Cole		X	
Zoe Hawes		X	
Yaacov Sheinfeld		X	

The State reserves the right to call witnesses included on Plaintiffs' witness list.

2. Exhibit List

The State submits the following exhibit list. The designation of an exhibit as "may use" does not necessarily mean that the State concedes that the exhibit is admissible if offered by Plaintiffs. The State may use such exhibits for impeachment only or offer them into evidence as appropriate. The State reserves the right to use additional documents for impeachment. The State reserves the right to offer any exhibit identified by Plaintiffs.

Trial Exhibit Number	Exhibit Description	Will Use	May Use	Stipulated/Plaintiffs' Objections
DX1	U.S. Health and Human Services Notice and Guidance on Care	X		
DX2	U.S. Health and Human Services Fact Sheet on Gender-Affirming Care	X		
DX3	U.S. Department of Justice Letter to State Attorneys General	X		

Trial Exhibit Number	Exhibit Description	Will Use	May Use	Stipulated/Plaintiffs' Objections
DX4	Centers for Medicare and Medicaid Services Decision Memo for Gender Dysphoria and Gender Reassignment Surgery	X		
DX5	Florida Department of Health Fact Sheet on Treatments for Gender Dysphoria	X		
DX6	Florida Medicaid Generally Accepted Professional Medical Standards Determination on the Treatment of Gender Dysphoria (with attachments)	X		
DX7	Sweden's Care of Children and Adolescents with Gender Dysphoria	X		
DX8	Sweden's Care of Children and Adolescents with Gender Dysphoria, Summary of National Guidelines	X		

Trial Exhibit Number	Exhibit Description	Will Use	May Use	Stipulated/Plaintiffs' Objections
DX9	Finland's Recommendation of the Council for Choices in Health Care in Finland	X		
DX10	The Cass Review, Independent Review of Gender Identity Services for Children and Young People	X		
DX11	National Institute for Health and Care Excellence, Evidence Review: Gonadotrophin Releasing Hormone Analogues for Children and Adolescents with Gender Dysphoria	X		
DX12	National Institute for Health and Care Excellence, Evidence Review: Gender-Affirming Hormones for Children and Adolescents with Gender Dysphoria	X		

Trial Exhibit Number	Exhibit Description	Will Use	May Use	Stipulated/Plaintiffs' Objections
DX13	France's Academie Nationale de Medecine Press Release	X		
DX14	The Royal Australian and New Zealand College of Psychiatrists' Position Statement on Gender-Affirming Care	X		
DX15	UKOM Report: Patient Safety for Children and Young People with Gender Incongruence	X		
DX16	WPATH Standards of Care, Version 8*	X		
DX17	WPATH Standards-of-Care-Revision Team Criteria*	X		
DX18	WPATH's Press Release Regarding Florida Department of Health *		X	
DX19	WPATH's Statement of Opposition to Florida Draft Rule Banning Gender Affirming Care for Adolescents*		X	

Trial Exhibit Number	Exhibit Description	Will Use	May Use	Stipulated/Plaintiffs' Objections
DX20	WPATH's Press Release on National and International Issues*		X	
DX21	WPATH's Letter to Japanese Officials*		X	
DX22	WPATH's Press Release Regarding <i>New York Times</i> Article*		X	
DX23	WPATH Press Release on United Kingdom Matter*		X	
DX24	Endocrine Society Guidelines on Treatments for Gender Dysphoria*	X		
DX25	Grading of Recommendations Assessment, Development and Evaluation Handbook*	X		
DX26	American Academy of Pediatrics, Ensuring Comprehensive Care and Support for Transgender and Gender-Diverse Children and Adolescents*		X	

Trial Exhibit Number	Exhibit Description	Will Use	May Use	Stipulated/Plaintiffs' Objections
DX27	Cecilia Dhejne et al., Long-Term Follow-Up of Transsexual Persons Undergoing Sex Reassignment Surgery: Cohort Study in Sweden		X	
DX28	Jonas Ludvigsson et al., A Systematic Review of Hormone Treatment for Children with Gender Dysphoria and Recommendations for Research		X	

* Note that the State includes the asterisked documents, which either come from or pertain to WPATH, the Endocrine Society, and medical organizations, in the event that the court denies the State's omnibus motion in limine, Doc.126. The State still maintains that such documents, and all mention of or reliance on the organizations, should be excluded at trial.

Dated: April 21, 2023

Respectfully submitted by:

/s/ Mohammad O. Jazil
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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2023, the foregoing was filed on CM/ECF,
which served all counsel of record.

/s/ Mohammad O. Jazil
Mohammad O. Jazil