

**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

DECLARATION OF L.W.

I, L.W., pursuant to 28 U.S.C §1746, declare as follows:

1. I am a Plaintiff in this action. I offer this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction. 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. I am a 15-year-old girl. I have a younger brother who is 12 years old. I live with him and my mom and my dad in Tennessee, where we have lived for my whole life.
3. I am in 9th grade. When I'm not at school, I like to play video games, listen to music, and build with Legos.
4. I am transgender. Growing up, it was hard for me to feel comfortable in my body. The first time I questioned my gender was in 2018, when I was ten-years-old and in the fourth grade. The feeling I had was like drowning. Similar to feeling trapped in water, I felt like I was

trapped in the wrong body and that I could not do anything about it. I did not like changing clothes in front of anyone and I would do my best to hide my body from my family and friends by wearing baggy clothing. My guy friends at school were talking about wanting to grow mustaches and beards. I remember thinking that was something I did not want to happen to me. I knew that I was different from those friends, but I did not know what to do with that feeling.

5. In 2019, when my cousin told my family that she is transgender, I finally understood what “transgender” meant. My cousin and I are very close, and when she started talking to me about the feelings she was having and her coming out process, I began to realize that she was describing the feelings I had been having too. In 2020, at the start of seventh grade, I told a close friend in my neighborhood that I know that I am transgender and that I was afraid to tell my family, and they helped me prepare for the conversation with my parents.

6. Before I understood what I was feeling and the name for it, I felt a lot of stress. I would get sick often because I did not feel comfortable using the boy’s bathroom at school. During this time, it was hard for me to focus, I was having trouble connecting with my friends, and I felt constant anxiety. I felt like I was hiding something from my family and like I couldn’t be myself.

7. Before talking to my family, I did a lot of research on my own about what it meant to be transgender. I would use Google and YouTube to search for information on doctors who support transgender kids like me and what they could do to help.

8. It took me a while to build up the courage to talk to my mom and dad. It was hard and I was nervous because I had no idea how my parents would react, and I was especially nervous about my dad’s reaction. The uncertainty of their reaction was the most difficult part. Although they had a positive reaction to my cousin coming out, I was not sure that it would be

the same for me. I eventually decided to talk to my mom about my feelings because I hoped that she could help me understand why I felt uncomfortable not being seen as myself and how I could start feeling better.

9. The first time I was able to talk with her about my feelings was in November of 2020, right after Thanksgiving. I was 12 years old at the time and in seventh grade. We went upstairs after dinner and had a long conversation about things I was struggling with, but mostly I told her that I did not want to be a guy anymore. My mom cried at first, and that was hard for me. She then asked me a lot of questions about what I meant, and I told her that I think I am transgender. I was relieved that she reacted in a supportive way.

10. We kept talking about it throughout that week, and each time we talked, she would just listen and tell me that she and Dad loved me, and that would never change. One week after our first conversation, my mom and I decided to tell my dad, and we told my brother soon after that. I finally felt like I could talk about who I am with my whole family.

11. At first, I thought that I might be non-binary, and I asked my parents to use “they” and “them” pronouns for me. But after exploring my gender more, in the winter of 2021, I decided that I wanted my family to call me “L.,” and to use “she” and “her” when they were talking about me at home. I also wanted to start wearing girls’ clothes more often so that I could feel better about how I looked, and I grew my hair long.

12. A few months after I came out to my parents, I told them that I wanted to see a doctor so that they could tell me more about being transgender and any medical treatment that might help me.

13. I began seeing my therapist once a month beginning in December of 2020. She assured me that there are other kids who go through the same things that I was going through and

there was nothing wrong with me. I learned that there is treatment available for kids like me to stop going through male puberty and live my life consistently as a girl.

14. In June of 2021, at the recommendation of my pediatrician, my parents took me to Vanderbilt Children's Hospital. During our first appointment, I met with Dr. Brady and her team of doctors who work with kids like me who are transgender. Dr. Brady was very nice and explained everything to me in a way that made sense. She ran tests and said that when the time was right, there was a medication that I could take so that I didn't go through changes associated with male puberty, like my voice getting deeper and growing facial hair. I did not want those things to happen to me because I am a girl, and I knew that they would make my gender dysphoria way worse. I was terrified about going through male puberty and I was happy to learn that I could begin treatment at the right time.

15. The next time we went back to see Dr. Brady in August of 2021, she determined that it was the right time for me to take the medication because as a thirteen-year-old, my body was starting to produce hormones that would physically change my body. Dr. Brady, my parents, and I all talked about it together again, and after she answered all of our questions, we decided that I would start taking puberty-delaying medications. I was relieved that I was able to start this medication because I knew I wouldn't have to go through a puberty that would seriously impact my mental health. I was horrified by the thought of my body changing in ways like teenage boys' do, and I knew I did not want those changes to happen.

16. This medication has made a big difference in how I feel about myself. I don't feel as scared or worried about my body changing in ways that would harm me because I know the medication is helping to stop those changes right now. Dr. Brady made me aware of several potential side effects but I felt strongly that the benefits would far outweigh them.

17. When I told my parents that I wanted to start sharing who I am with my teachers, they said I could, and in September of 2021 at the beginning of eighth grade, I told my teachers to use a shortened, gender-neutral version of my birth name. My school was super supportive. In January of 2022, in the middle of eighth grade, I shared with all my friends and my teachers that my name is L., I am a girl, and that they should use “she” and “her” pronouns when they talk about me.

18. In September of 2022, after 13 months of being on puberty-delaying medication, Dr. Brady told me and my parents that I was eligible to start estrogen hormone therapy so that my body will go through the changes that other girls’ bodies go through during puberty. She talked to me and my family again about all of the risks associated with taking estrogen, and after we asked all our questions and told her that we understood all of the risks, she prescribed me the medication.

19. Before starting medication, I experienced gender dysphoria on two levels. One was a near-constant feeling that just happened in the background, and that feeling has gone away nearly completely now after taking medication. The other level is a more sporadic experience regarding aspects of my body that still don’t align with my gender identity. For example, when I would go to the dentist and see a few hairs above my lip, I would be terrified. I rarely experience that anymore, and when I do, it is just not as bad. I feel much more confident and comfortable now that I have medication that helps me live as the girl that I am.

20. If my gender identity were fully affirmed by continuing my care, I could go into a public bathroom without having to think about it, I could enjoy shopping and not feel like everyone is staring at me, and I could feel comfortable and at home in my own body. I am

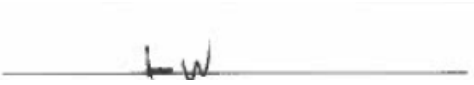
terrified of being misgendered and I am afraid that is what will happen if I lose access to my medication.

21. A law like the one my state passed is going to cause harm to me, my family, and other families like us in Tennessee. I have been incredibly stressed. Without this medication, my body will go through changes that I do not want and that do not feel good or right for a girl like me. This law would mean that I could not stop those changes, and I am terrified because I know some of them would be permanent. If my care was taken away, I know that I would not be able to think about anything else in my life except when I could get my medication again. It is painful to even think about having to go back to the place I was in before I was able to come out and access the care that my doctors have prescribed for me.

21. My parents have talked with me a little bit about what we might have to do if this law goes into effect. We might have to leave Tennessee, which is really unfair – Tennessee is the place I love and have lived my entire life, and my family and friends are all here. I don't know what my parents would do about their jobs, or even where we would go. It scares me to think about losing the medication that I need and I hate that continuing it could mean leaving my home. It scares me even more that laws like these will further alienate transgender people like me from the rest of society and dehumanize us in the eyes of other people.

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

Dated: April 18, 2023


L.W.