Richard Eppink (Bar No. 7503)
AMERICAN CIVIL LIBERTIES UNION
OF IDAHO FOUNDATION
P. O. Box 1897
Boise, ID 83701
T: (208) 344-9750 ext. 1202
REppink@acluidaho.org

Gabriel Arkles*
James Esseks*
Chase Strangio*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad St.,
New York, NY 10004
T: (212) 549-2569
garkles@aclu.org
jesseks@aclu.org
cstrangio@aclu.org

Kathleen Hartnett*
COOLEY LLP
101 California Street 5th Floor
San Francisco, CA 94111-5800
T: (415) 693-2000
F: (415) 693-2222
khartnett@cooley.com

Elizabeth Prelogar*
COOLEY LLP
1299 Pennsylvania Avenue, NW Suite 700
Washington D.C. 20004-2400
T: (202) 842-7800
F: (202) 842-7899
eprelogar@cooley.com

Andrew Barr*
COOLEY LLP
380 Interlocken Crescent, Ste. 900
Broomfield, CO 80021-8023
T: (720) 566-4000
F: (720) 566-4099
abarr@cooley.com

Catherine West*
LEGAL VOICE
907 Pine Street, Unit 500
Seattle, WA 98101
T: (206) 682-9552
F: (206) 682-9556
cwest@legalvoice.org

* Admitted *Pro Hac Vice*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

LINDSAY HECOX, et al., *Plaintiffs*, v. BRADLEY LITTLE, et al., *Defendants*.	No. 1:20-cv-00184-CWD **DECLARATION OF JEAN DOE IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

I, Jean Doe, depose and say as follows:

1. I am over the age of eighteen and have personal knowledge of the facts herein.

2. My daughter, Jane Doe, is seventeen years old and she will be a senior at Boise High School in Fall 2020.

3. Since she was a young child, Jane has participated in athletic activities. Jane has a natural athleticism and has always excelled at sports.

4. Jane's involvement with sports has allowed her to develop as a young woman. She has taken the confidence and work ethic she developed on the playing field into the classroom. It is hard to imagine where Jane would be in her life if she didn't have the many positive experiences of playing and competing on teams.

5. Jane is a member of Boise High School's girls' soccer and track teams. In Idaho, the soccer season is in the fall and the track season is in the spring.

6. Jane is currently training to be ready for the fall soccer season.

7. In order to be ready to play soccer, Jane does the following:

- cardiovascular conditioning five days per week to improve her fitness level for games;
- private coaching two to three days per week to prepare her technical abilities;
- attends open plays and optional practices three days per week throughout the summer, which also helps to bond with her team and coaches;
- weight training three days per week in the off- and pre-season to increase her physical strength; and
- regular correspondence with college coaches as part of the college soccer recruiting process.

8. Jane's life is largely dominated by sports, her teammates, and competing. She derives great enjoyment from being on a team and competing.

9. Jane has pushed herself physically and been rewarded by what she has achieved athletically.

10. Jane has an athletic, masculine build.

11. At one point, in middle school, other students jokingly referred to her as a boy.

12. With her athletic build and performance in sports, I am concerned that someone will use Idaho's new law to dispute her gender. I am concerned this could be done simply to discourage Jane from playing even though the challenger knows that Jane is a girl.

13. As Jane's mother, I am concerned that she would be put in the position of getting invasive medical procedures and blood tests she doesn't need to play the sports she loves.

14. Jane is currently being recruited to play soccer in college. If she is unable to play her senior season, it is unlikely college coaches would offer her a position on their team, which could mean she would lose out on scholarship opportunities otherwise available to her.

15. It is very frustrating to me that Jane's ability to compete could be questioned or even prevented by anyone who wants to "verify" her "biological sex."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28th day of April, 2020.

Jean Doe

Jean Doe

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of April, 2020, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Dan Skinner
danskinner@cssklaw.com
cssklaw@cssklaw.com
Attorney for Boise School District,
Individual members of the Board of Trustees of Boise School District,
Coby Dennis

Steven L. Olsen
steven.olsen@ag.idaho.gov
W. Scott Zanzig
scott.zanzig@ag.idaho.gov
Dayton P. Reed
dayton.reed@ag.idaho.gov
Attorneys for Bradley Little,
Sherri Ybarra,
Individual members of the State Board of Education,
Boise State University,
Marlene Tromp,
Individual members of the Idaho Code Commission

DATED this 30th day of April, 2020.

/s/ Richard Eppink