

NO. 03-22-00126-CV

---

**In the Court of Appeals  
for the Third District of Texas at Austin**

---

GREG ABBOTT, in his official capacity as Governor of the State of Texas;  
JAIME MASTERS, in her official capacity as Commissioner of the Texas  
Department of Family and Protective Services; and TEXAS DEPARTMENT OF  
FAMILY AND PROTECTIVE SERVICES,

Appellants,

v.

JANE DOE, individually and as parent and next friend of MARY DOE, a minor;  
JOHN DOE, individually and as parent and next friend of MARY DOE, a minor;  
and DR. MEGAN MOONEY MEDICAL, LLC,

Appellees,

---

On Appeal from the 201st Judicial District of Travis County, Texas  
Cause No. D-1-GN-22-000977, Hon. Amy Clark Meachum

---

**AMICUS BRIEF OF CURRENT AND FORMER CHIEF PROSECUTORS,  
ATTORNEYS GENERAL, AND LAW ENFORCEMENT LEADERS, AND  
FORMER STATE AND FEDERAL JUDGES, U.S. ATTORNEYS, AND U.S.  
DEPARTMENT OF JUSTICE OFFICIALS IN SUPPORT OF APPELLEES**

---

*Counsel for Amici Curiae*

**REED SMITH LLP**

R. Alan York (TX Bar No. 22167500)  
811 Main St., Ste 1700  
Houston, TX 77002  
Omar J. Alaniz (TX Bar No. 24040402)  
2850 N. Harwood St., Ste. 1500  
Dallas, TX 75201  
Telephone: (713) 469-3800  
Facsimile: (713) 469-3899  
Email: ayork@reedsmith.com  
Email: oalaniz@reedsmith.com

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**

Martha L. Fitzgerald (*pro hac vice* pending)  
Amalia Y. Sax-Bolder (*pro hac vice* pending)  
Craig M. Finger (*pro hac vice* pending)  
410 Seventeenth Street, Suite 2200  
Denver, CO 80202  
Telephone: (303) 223-1100  
Facsimile: (303) 223-1111  
Email: mfitzgerald@bhfs.com  
Email: asax-bolder@bhfs.com  
Email: cfinger@bhfs.com

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
INTRODUCTION .....	1
INTEREST OF AMICI CURIAE.....	1
SUMMARY OF ARGUMENT .....	3
BACKGROUND .....	4
ARGUMENT .....	6
I.    By Specifically Targeting Transgender Children, their Families, and Medical Professionals — and Intruding on their Right to Seek and Provide Approved Medical Care — the Appellants’ Actions Undermine Community Trust and Threaten Public Safety .....	6
II.   The Appellants’ Actions Will Increase the Risk of Violence and Abuse Against Transgender Children by Isolating Them from the Protection of the Criminal Legal System.....	13
CONCLUSION .....	16

**TABLE OF AUTHORITIES**

	<b>Page(s)</b>
<b>Statutes</b>	
TEX. FAM. CODE § 261.001(1)(A–D).....	10
<b>Other Authorities</b>	
American Academy of Pediatrics Policy Statement, <i>Ensuring Comprehensive Care and Support for Transgender and Gender-Diverse Children and Adolescents</i> , 142(4) <i>Pediatrics</i> (Oct. 2018) .....	9
American Psychological Association, <i>Resolution on Supporting Sexual/Gender Diverse Children and Adolescents in Schools</i> (2020).....	10
Amy E. Green, Ph. D. et al., <i>Association of Gender-Affirming Hormone Therapy with Depression, Thoughts of Suicide, and Attempted Suicide Among Transgender and Nonbinary Youth</i> , 70 <i>J. of Adolescent Health</i> 643 (2022).....	7
Andrew Goldsmith, <i>Police Reform and the Problem of Trust</i> , 9 <i>Theoretical Criminology</i> 443 (2005).....	8
Andrew R. Flores, Ilan H. Meyer, Lynn Langton, and Jody L. Herman, <i>Gender Identity Disparities in Criminal Victimization</i> , 111 <i>American Journal of Public Health</i> 4 (2021).....	13
Attorney General Opinion No. KP-0401 (Feb. 18, 2022) .....	4
Br. of <i>Amici Curiae</i> Am. Academy of Pediatrics, et al. Supp. App. Emerg. Mot. for TRO, <i>Doe v. Abbott</i> , No. 03-22-00126-CV (Tex. App. Mar. 18, 2022) .....	5, 9
<i>Building Community Trust: Key Principles and Promising Practices in Community Prosecution and Engagement</i> , Fair and Just Prosecution, Mar. 2018.....	8
Dawn Ennis, <i>Gender-Affirming Care Linked To Less Depression, Lower Suicide Risk For Trans Youth</i> , <i>Forbes</i> (Dec. 14, 2021).....	7

Elizabeth Fussell, <i>The Deportation Threat Dynamic and Victimization of Latino Migrants: Wage Theft and Robbery</i> , 52 Soc. Q. 593 (2011) .....	15
Endocrine Society, <i>Gender Dysphoria/Gender Incongruence Guideline Resources</i> (Sept. 2017) .....	10
Fabian Luis Fernandez, <i>Hands Up: A Systematized Review Of Policing Sex Workers In The U.S.</i> , Yale University School of Public Health Theses 1085 (2016).....	15
Governor Greg Abbott, <i>Letter to Commissioner Jaime Masters</i> (Feb. 22, 2022) .....	4
H.B. 1399, 87th Leg., Reg. Sess. (Tex. 2021) .....	12
Lucy Platt, et al., <i>Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies</i> , Plos Medicine (2018) .....	15
Michelle M. Johns, et al., <i>Transgender Identity and Experiences of Violence Victimization, Substance Use, Suicide Risk, and Sexual Risk Behaviors Among High School Students — 19 States and Large Urban School Districts, 2017</i> , 68 Morbidity and Mortality Weekly Report 67 (Jan. 25, 2019).....	13
Min Xie & Eric P. Baumer, <i>Neighborhood immigrant concentration and violent crime reporting to the police: A multilevel analysis of data from the National Crime Victimization Survey</i> , 57 Criminology 237 (2019) .....	14
Nik Theodore, <i>Insecure Communities: Latino Perceptions of Police Involvement in Immigration Enforcement</i> , Policy Link, (2013).....	14
S.B. 1311, 87th Leg., Reg. Sess. (Tex. 2021).....	12
S.B. 1646, 87th Leg., Reg. Sess. (Tex. 2021).....	12
Texas Pediatric Society, <i>AAP, Texas Pediatric Society Oppose Actions in Texas Threatening Health of Transgender Youth</i> (Feb. 24, 2022).....	10

Thomas C. O'Brien & Tom R. Tyler, *Rebuilding Trust Between Police & Communities Through Procedural Justice & Reconciliation*, 5 Behav. Sci. & Pol'y 35 (2019) .....9

Tom R. Tyler & Jeffrey Fagan, *Legitimacy and Cooperation: Why Do People Help the Police Fight Crime in Their Communities?*, 6 Ohio St. J. Crim. L. 231 (2008) .....8

Tom R. Tyler & Jonathan Jackson, *Popular Legitimacy and the Exercise of Legal Authority: Motivating Compliance, Cooperation and Engagement*, 20 Psych., Pub. Pol'y & L. 78 (2013) .....8

## **INTRODUCTION**

*Amici* — current and former state and local chief prosecutors, Attorneys General, and law enforcement leaders, and former state and federal judges, U.S. Attorneys, and U.S. Department of Justice Officials<sup>1</sup> — file this brief in support of Appellees, who ask this Court to affirm the lower court’s entry of a temporary injunction to suspend enforcement of the invalid and unlawful agency rule that targets for investigation and potentially even prosecution parents of transgender children, as well as medical and other professionals, based on efforts to seek, provide, or consent to recognized and approved gender-affirming medical care for children with gender dysphoria.

## **INTEREST OF AMICI CURIAE**

*Amici curiae* are current and former chief prosecutors, Attorneys General and law enforcement leaders, and former state and federal court judges, U.S. Attorneys, and U.S. Department of Justice officials, all of whom are committed to protecting the integrity of the justice system, upholding the Constitution and rule of law, and promoting safer and healthier communities.<sup>2</sup>

*Amici* have decades of experience safeguarding public safety as well as the integrity of the American criminal justice and legal systems. They are united in the

---

<sup>1</sup> A list of *amici* is attached as Appendix A.

<sup>2</sup> No person was paid a fee for preparation of this brief, and no party to the case participated in drafting it.

conviction that a core tenet of the pursuit of justice is the furtherance of fair and equitable policies and practices that comport with constitutional law and protect the well-being of members of their community.

Drawing on their collective experiences, *amici* recognize that trust in the rule of law and the justice system is the foundation for keeping communities safe. When anyone — let alone an already vulnerable group of individuals — is excluded from the law’s protections, all members of our communities lose trust that the law is being applied uniformly and fairly. This loss of trust inhibits the ability of law enforcement and stakeholders in the justice system to promote public safety.

Appellants’ adoption of new policies and rules which potentially criminalize medically necessary gender-affirming healthcare and label this medical treatment as “child abuse” are of deep concern to *amici*. By singling out families with transgender children for government interference and opening the door to intrusions into the privacy of deeply personal medical care, while also triggering potential family separation and even prosecution based on clinically recommended treatment, Appellants have profoundly threatened both public trust and the well-being of these children and their loved ones. Policies such as these create troubling and destructive barriers between members of vulnerable communities and law enforcement and will only increase the risk of victimization, abuse, and violence these individuals face.

## **SUMMARY OF ARGUMENT**

Appellants have interjected the government into the personal healthcare decisions of some of the state's most vulnerable youth, punishing parents who follow the medical guidance of qualified professionals in seeking care for their children. Appellants' policies and the resulting investigations have no basis in public health and will inevitably lead to children not getting life-sustaining medical care. And if these policies are ultimately allowed to stand, the public will lose confidence that the law exists to safeguard society, and trust in legal authorities and government agencies will necessarily suffer.

The ripple effects of such a result will be enormous. Prosecutors and law enforcement leaders rely on the trust of their communities to promote public safety. When individuals lack confidence in legal authorities and view government agencies and officials, the lawyers who represent them, police, the courts, and the law as illegitimate, they are less likely to report crimes, cooperate as witnesses, and accept police and judicial authority. By using the law to selectively persecute transgender children and their families, Appellants create untold damage to the bonds of trust between our community and our entire governmental and law enforcement system that are fundamental to its operation.

The Appellants' targeting of transgender children and their families also isolates these particularly vulnerable individuals from the protection of the criminal



legal system. Transgender children are already more likely than their cisgender peers to be victims of violence and harassment. If transgender children and their families know that the police, teachers, and school officials can seek to file abuse reports against them simply for utilizing critical *medical* care, they will be significantly less likely to seek help or redress when they become the victims of crime. Their effective lack of access to law enforcement will only exacerbate the potential for violence and abuse.

### **BACKGROUND**

At issue in this case are the Texas Department of Family and Protective Services' ("DFPS") policies and investigations, first initiated following a letter from the Texas Governor, urging the DFPS Commissioner to conduct a "prompt and thorough investigation" of any reported instances of gender-affirming care as potential child abuse. The letter asked the DFPS to mandate reporting of minors who have or are receiving this treatment, as well as their parents, by "all licensed professionals who have direct contact with children" as well as "all members of the public." Governor Greg Abbott, *Letter to Commissioner Jaime Masters* (Feb. 22, 2022).<sup>3</sup> The Governor's letter referenced an earlier opinion by the Texas Attorney General concluding that medically approved treatment for minors with gender dysphoria could constitute child abuse under state law. Attorney General Opinion

---

<sup>3</sup> <https://gov.texas.gov/uploads/files/press/O-MastersJaime202202221358.pdf>.

No. KP-0401 (Feb. 18, 2022).<sup>4</sup> The same day the Governor’s letter was released, Texas DFPS announced that it would initiate investigations of potential child abuse consistent with the Attorney General’s opinion.

DFPS immediately began investigating one of its own — Jane Doe, a caseworker who, following receipt of the Governor’s letter, alerted her supervisor that she is the mother of a transgender child. This unjustified government intrusion into her family’s most private affairs not only unfairly singled this family out for humiliation and harassment, but it also put at risk the parents’ continued custody of their child, their right to pursue treatment for her diagnosed condition, and the employment of Jane Doe herself. Another appellee in this litigation, Dr. Megan Mooney, risks losing her practice and license based on her efforts to treat and care for transgender patients. All now live under the threat of criminal prosecution.

After a hearing on a motion for temporary injunction, the lower court enjoined Appellants from investigating any abuse reports founded only on the provision of gender-affirming care to transgender children, including the investigation of Jane

---

<sup>4</sup> Despite this sweeping pronouncement, the memorandum primarily focused on surgical procedures that could cause sterilization, such as forced castration and female genital mutilation, as the basis for its conclusion. *See id.* at 1, 9, *available at* <https://www.texasattorneygeneral.gov/sites/default/files/opinion-files/opinion/2022/kp-0401.pdf>. However, surgical procedures are not recommended and are generally not allowed for transgender minors. *See Br. of Amici Curiae Am. Academy of Pediatrics, et al. Supp. App. Emerg. Mot. for TRO at 13, Doe v. Abbott*, No. 03-22-00126-CV (Tex. App. Mar. 18, 2022).

and John Doe, prosecuting or referring for prosecution this conduct as child abuse, or imposing reporting requirements on any person in relation to gender-affirming care. At issue in this case is the validity and enforcement of these policies and investigations statewide and, as the trial court noted in its order imposing the temporary injunction, the potential for “prosecuting or referring for prosecution” these reports of purported abuse.

### **ARGUMENT**

#### **I. By Specifically Targeting Transgender Children, their Families, and Medical Professionals — and Intruding on their Right to Seek and Provide Approved Medical Care — the Appellants’ Actions Undermine Community Trust and Threaten Public Safety**

The policies and investigations at issue in this case target one of the most vulnerable populations in America — transgender youth. These practices interject the government into personal healthcare decisions and punish parents who follow the medical guidance of qualified professionals in seeking care for their children, threatening them with investigation and even prosecution as child abusers. This intrusion also ensnares the doctors, social workers, counselors, and other individuals who are entrusted with providing critical foundational support for these children, forcing them to become mandatory reporters and subjecting them to their own adverse consequences. It also traps prosecutors and police officers, individuals charged with protecting the most vulnerable, by entangling them in potential criminal action triggered by child abuse reports from DFPS. All of these devastating

actions occur under the auspices of the rule of law and turn what is often life-saving treatment for children into “child abuse.” See Dawn Ennis, *Gender-Affirming Care Linked To Less Depression, Lower Suicide Risk For Trans Youth*, Forbes (Dec. 14, 2021) (citing Amy E. Green, Ph. D. et al., *Association of Gender-Affirming Hormone Therapy with Depression, Thoughts of Suicide, and Attempted Suicide Among Transgender and Nonbinary Youth*, 70 J. of Adolescent Health 643 (2022)).<sup>5</sup>

Appellants’ policies and investigations target transgender children and their families by subjecting them to intrusive questioning, invasion of their homes and private spaces, and interference with the confidentiality ordinarily shared between individuals and medical professionals. If these policies are allowed to stand, many will legitimately question whether the law exists not to protect members of our community, but to harm them — and this inevitable conclusion will be felt most deeply by children who are already marginalized, along with their loving parents and professionals who have devoted their careers to serving those in need of care and support. These mandates will erode trust and faith in government, and it will diminish our ability to keep people safe.

Prosecutors and law enforcement officials rely on community trust and faith in the integrity of our legal system to perform their jobs. When the integrity of the

---

<sup>5</sup> <https://www.forbes.com/sites/dawnstaceyennis/2021/12/14/gender-affirming-care-linked-to-less-depression-lower-suicide-risk-for-trans-youth/?sh=122ec0375d25>.

rule of law — and people’s belief in its even-handed application and enforcement — is undermined, it becomes more difficult for law enforcement officials and criminal justice leaders to maintain community trust and protect public safety. *See e.g., Tom R. Tyler & Jonathan Jackson, Popular Legitimacy and the Exercise of Legal Authority: Motivating Compliance, Cooperation and Engagement*, 20 *Psych., Pub. Pol’y & L.* 78, 78–79 (2013); *Building Community Trust: Key Principles and Promising Practices in Community Prosecution and Engagement*, Fair and Just Prosecution, Mar. 2018, at 1 (“Trust between the community and the prosecutor’s office is essential to maintain the office’s legitimacy and credibility.”).<sup>6</sup> When individuals lack confidence in legal authorities and view protective government agencies and officials, the lawyers who represent them, the police, the courts, and the law as illegitimate, they are less likely to report crimes, cooperate as witnesses, and accept police and judicial system authority. *See Tom R. Tyler & Jeffrey Fagan, Legitimacy and Cooperation: Why Do People Help the Police Fight Crime in Their Communities?*, 6 *Ohio St. J. Crim. L.* 231, 263 (2008). Unfair, discriminatory, and arbitrary practices by government officials erode essential community confidence and trust in law enforcement and our justice system. *See Andrew Goldsmith, Police Reform and the Problem of Trust*, 9 *Theoretical Criminology* 443, 452–57 (2005);

---

<sup>6</sup> [https://www.fairandjustprosecution.org/staging/wp-content/uploads/2018/03/FJP\\_Brief\\_CommunityProsecution.pdf](https://www.fairandjustprosecution.org/staging/wp-content/uploads/2018/03/FJP_Brief_CommunityProsecution.pdf).

Thomas C. O'Brien & Tom R. Tyler, *Rebuilding Trust Between Police & Communities Through Procedural Justice & Reconciliation*, 5 *Behav. Sci. & Pol'y* 35 (2019).

By singling out transgender children and their families, seeking to monitor their private decisions, and characterizing their private medical treatment and care as abuse, the Appellants create untold damage to the critical bonds of trust between our community and our entire governmental and law enforcement system. Through these investigations, DFPS has made clear that, despite the fact that gender-affirming care is medically approved and often lifesaving, it will ignore medical advice and target parents of some of the most vulnerable children in our community. These policies have effectively expanded the definition of child abuse to include seeking gender-affirming treatment, which is recognized by the American Academy of Pediatrics and others as critical for transgender youth.<sup>7</sup> They have turned laws

---

<sup>7</sup> While some have, sadly, chosen to stigmatize and dismiss care for transgender children, gender-affirming treatment is well-established and medically necessary for youth diagnosed with gender dysphoria to prevent depression, anxiety, self-harm, and suicide. *See* Br. of *Amici Curiae* Am. Academy of Pediatrics, et al. as *Amici Curiae* Supp. Supp. App. Emerg. Mot. for TRO, *supra*, at 5; Br. of *Amici Curiae* Am. Prof. Soc. on the Abuse of Children, et al. Supp. App. Emerg. Mot. for TRO at 16, *Doe v. Abbott*, No. 03-22-00126-CV (Tex. App. Mar. 18, 2022). Gender-affirming medical care has been approved by several medical professional organizations, including the American Academy of Pediatrics, American Psychological Association, Endocrine Society, and the Texas Pediatric Society. American Academy of Pediatrics Policy Statement, *Ensuring Comprehensive Care and Support for Transgender and Gender-Diverse Children and Adolescents*, 142(4) *Pediatrics* (Oct. 2018), <https://bit.ly/3HGMTwF>;

designed to protect vulnerable children into tools to attack them. And to make matters worse, doctors, service providers for children, and the public at large are all now entangled in this dystopian landscape as mandated reporters of this distorted conception of “abuse.” Rather than focus on investigating parents who truly neglect and harm their children through physical or emotional violence, these Texas officials seek to use the law to prevent life-saving measures for vulnerable children.

When we allow elected officials to subvert the law’s protection and instead use it in oppressive ways — as is occurring here — we destroy any faith that the community may have in the government and its leaders. A community that believes the government is targeting loving families who are merely seeking medically approved healthcare for their children can have little faith that their government will

---

American Psychological Association, *Resolution on Supporting Sexual/Gender Diverse Children and Adolescents in Schools* (2020), <https://bit.ly/3IPQb1Z>; Endocrine Society, *Gender Dysphoria/Gender Incongruence Guideline Resources* (Sept. 2017), <https://bit.ly/3vJtysq>; Texas Pediatric Society, *AAP, Texas Pediatric Society Oppose Actions in Texas Threatening Health of Transgender Youth* (Feb. 24, 2022), <https://bit.ly/3vI7tdy>. Just as it is inconceivable that parents seeking chemotherapy for a child diagnosed with cancer could face “child abuse” allegations and potential criminal prosecution, it should be equally unimaginable that parents and medical professionals seeking to treat a child with medically recognized gender-affirming care should be subject to the parade of horrors triggered by DFPS policies. Parents could realistically face the Hobson’s choice of providing their transgender children with medically necessary care and risking adverse consequences for doing so, or not seeking needed care and being accused of medical neglect under Texas law. *See* TEX. FAM. CODE § 261.001(1)(A–D). Such fundamental contradictions in the law necessarily erode trust in the legal system.

protect them, any more than it would believe that a government targeting certain religions or races would protect them. And once members of our community believe that the government is working to oppress and harm people through the rule of law, they lose all faith in the integrity of enforcement of a system of laws. When our laws — and the government we entrust to enforce them — lack credibility, people will start ignoring the law and instead act without regard to the guideposts of our justice system. Some might act as individual vigilante enforcers rather than call the police, and others may simply conclude that legal protections do not exist and feel free to prey on vulnerable individuals who look, think, or behave differently — just as the Texas government is doing here. No one benefits when this lawlessness threatens to replace the norms of our criminal legal system.

It is not only those implementing the policies and investigations at issue — the Commissioner or DFPS — who will lose legitimacy with the public. Prosecutors and law enforcement leaders sworn to promote community safety and well-being will also lose moral authority. The public will likely infer that, when the highest elected officials in the State have identified certain actions as abusive, and triggered investigations as a result, police investigation and criminal prosecution will follow. If the public believes that the criminal legal system could use the law as a sword against the vulnerable, it will have little respect for the authority of prosecutors and law enforcement leaders. Members of the public will reasonably decline to cooperate



in police investigations, because they will be unsure that the criminal legal system has their best interests at heart. They will also be unwilling to report crimes. All of these consequences will erode public safety and trust in the rule of law.

The public's trust in the democratic and judicial systems is further diminished by the Appellants' attempt to circumvent the legislative process in contravention of the will of the Legislature and Texas citizens. Specifically, the Texas Legislature tried, and failed, to pass laws that would ban gender-affirming medical care.<sup>8</sup> As the district court correctly found, the policies at issue here violate numerous constitutional and statutory limits on the Appellants' power, and thus, weaken the public's trust in essential government institutions.

Simply put, these policies and investigations by DFPS have the potential to undermine trust in every level of government and law enforcement both within and outside of Texas. They have diminished the moral weight of the rule of law and called into question the ability of government actors to act as protectors, instead casting them as persecutors. *Amici* have significant concerns as to the long-term impact this will have on our legal system and public safety — and the adverse ripple effects that will inevitably be felt not simply in the state of Texas.

---

<sup>8</sup> See S.B. 1311, 87th Leg., Reg. Sess. (Tex. 2021); H.B. 1399, 87th Leg., Reg. Sess. (Tex. 2021); S.B. 1646, 87th Leg., Reg. Sess. (Tex. 2021).

## **II. The Appellants' Actions Will Increase the Risk of Violence and Abuse Against Transgender Children by Isolating Them from the Protection of the Criminal Legal System**

In addition to eroding community trust, the Appellants' targeting of transgender children and their families will isolate these already vulnerable individuals from the protection of the criminal legal system. Transgender people, including transgender teens, are already significantly more likely to be abused, harassed, and attacked than their cisgender peers. One study using data from the 2017-2018 National Crime Victimization Survey concluded that transgender people are over four times as likely to be subjected to personal violence than cisgender people, and households with transgender members are more than twice as likely to be the victims of property crimes. Andrew R. Flores, Ilan H. Meyer, Lynn Langton, and Jody L. Herman, *Gender Identity Disparities in Criminal Victimization*, 111 *American Journal of Public Health* 4 (2021).<sup>9</sup> Transgender high school students show similar vulnerability, and studies of the prevalence of violent victimization among them reveal substantially higher rates than found in cisgender students. Michelle M. Johns, et al., *Transgender Identity and Experiences of Violence Victimization, Substance Use, Suicide Risk, and Sexual Risk Behaviors Among High School Students — 19 States and Large Urban School Districts, 2017*, 68 *Morbidity*

---

<sup>9</sup> <https://escholarship.org/uc/item/7c3704zg#main>.

and Mortality Weekly Report 67 (Jan. 25, 2019).<sup>10</sup> For example, 23.8 percent of transgender students interviewed had been forced to have sexual intercourse at some point, and 26.4 percent experienced physical dating violence. *Id.*

The Appellants’ actions make it significantly more difficult for law enforcement to protect transgender children and their families from this abuse. If transgender children and their families know that the police, teachers, and school officials are an integral part of abuse reports that are filed against them as they seek critical medical care, they will be significantly less likely to seek help or redress when they become the victims of crime.

This same phenomenon occurs in other communities who constantly live under the threat of investigation, family separation, or criminal charges. Fearing deportation, many undocumented persons do not seek help from the police when they are victimized. Nik Theodore, *Insecure Communities: Latino Perceptions of Police Involvement in Immigration Enforcement*, Policy Link, (2013) at 3, 5–6 (study concluding that undocumented persons are significantly less likely to contact the police when victimized: “the increased involvement of police in immigration enforcement has significantly heightened the fears many Latinos have of the police . . . exacerbating their mistrust of law enforcement authorities”);<sup>11</sup> Min Xie & Eric

---

<sup>10</sup> [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6348759/#\\_\\_ffn\\_sectitle](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6348759/#__ffn_sectitle).

<sup>11</sup> <https://perma.cc/XEE8-P42V>.

P. Baumer, *Neighborhood immigrant concentration and violent crime reporting to the police: A multilevel analysis of data from the National Crime Victimization Survey*, 57 *Criminology* 237, 249 (2019) (concluding that communities with a high concentration of recent immigrants are significantly less likely to report victimization to the police).<sup>12</sup> This understandable lack of cooperation has exacerbated the vulnerability of the undocumented, as they and their family members are increasingly selected as low-risk targets for criminal activity. See Elizabeth Fussell, *The Deportation Threat Dynamic and Victimization of Latino Migrants: Wage Theft and Robbery*, 52 *Soc. Q.* 593, 610 (2011).<sup>13</sup> If this court fails to intervene, transgender children and their families could suffer the same consequences.

---

<sup>12</sup> <https://perma.cc/QS5R-K867>.

<sup>13</sup> Similarly, sex workers who are under threat of arrest and prosecution often decline to report abuse, thefts, or violent crimes to the police. Fabian Luis Fernandez, *Hands Up: A Systematized Review Of Policing Sex Workers In The U.S.*, Yale University School of Public Health Theses 1085 (2016), <https://elischolar.library.yale.edu/cgi/viewcontent.cgi?article=1084&context=ysphtdl>. Without the protection of law enforcement, sex workers are also substantially more likely to become victims of violence, including by clients and intimate partners. Lucy Platt, et al., *Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies*, *Plos Medicine* (2018), <https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1002680>.

## CONCLUSION

The policies and investigations at issue in this case threaten the very core of our system of justice and threaten to erode the foundational trust in government that is integral to promoting public safety. They subvert the moral weight of the rule of law and replace it with deeply troubling judgments and unfounded assumptions grounded in bias. In so doing, they destroy community trust in the integrity of our laws, government institutions, and the legitimacy of those entities charged with protecting the most vulnerable. Instead of safeguarding transgender children, it discourages them from seeking our protection and puts them at risk. *Amici* — individuals committed to public safety who have devoted decades to the service, protection, and well-being of others — cannot stand idly by as this occurs. We therefore ask this Court to affirm the lower court’s award of injunctive relief.

Dated: July 25, 2022

Respectfully submitted,

By: /s/ R. Alan York

R. Alan York  
(TX Bar No. 22167500)  
Omar J. Alaniz  
(TX Bar No. 24040402)

**REED SMITH LLP**

811 Main St., Ste 1700  
Houston, TX 77002  
2850 N. Harwood St., Ste. 1500  
Dallas, TX 75201  
Telephone: (713) 469-3800  
Facsimile: (713) 469-3899  
Email: ayork@reedsmith.com  
Email: oalaniz@reedsmith.com

By: /s/ Martha L. Fitzgerald

Martha L. Fitzgerald  
(*pro hac vice* pending)  
Amalia Y. Sax-Bolder  
(*pro hac vice* pending)  
Craig M. Finger  
(*pro hac vice* pending)

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

410 Seventeenth Street, Suite 2200  
Denver, CO 80202  
Telephone: (303) 223-1100  
Facsimile: (303) 223-1111  
Email: mfitzgerald@bhfs.com  
Email: asax-bolder@bhfs.com  
Email: cfinger@bhfs.com

## **Certificate of Compliance**

This brief was prepared using Microsoft Word in Times New Roman font. The font size in the text is 14-point and the footnotes are 12-point. Based on a word count in Microsoft Word, this brief contains 3,652 words, excluding portions of the brief exempt from the word count under Texas Rule of Appellate Procedure 9.4(i)(1).

*/s/ R. Alan York*  
\_\_\_\_\_

R. Alan York

## Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument was served in accordance with the Texas Rules of Appellate Procedure on the 25<sup>th</sup> day of July, 2022 on each of the following persons listed below as indicated via the court's electronic filing system.

/s/ R. Alan York

R. Alan York

### *Counsel for Appellants*

Ken Paxton  
Brent Webster  
Judd E. Stone II (lead counsel)  
Natalie D. Thompson  
Christopher Hilton  
Courtney Corbello  
Ryan Kercher  
Office of the Attorney General  
P.O. Box 12548  
Austin, Texas 78711  
judd.stone@oag.texas.gov  
natalie.thompson@oag.texas.gov  
courtney.corbello@oag.texas.gov  
ryan.kercher@oag.texas.gov



*Counsel for Appellees*

Paul D. Castillo  
Shelly L. Skeen  
Nicholas “Guilly” Guillory  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
3500 Oak Lawn Ave., Unit 500  
Dallas, Texas 75219

Omar Gonzalez-Pagan  
M. Currey Cook  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
120 Wall Street, 19th Floor  
New York, New York 10005-3919

Karen L. Loewy  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
1776 K Street, N.W., 8th Floor  
Washington, DC 20006-2304

Camilla B. Taylor  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
65 E. Wacker Place, Suite 2000  
Chicago, IL 60601-7245

Brandt Thomas Roessler  
BAKER BOTTS L.L.P.  
30 Rockefeller Plaza  
New York, New York 10112-4498

Brian Klosterboer  
Andre Segura  
Savannah Kumar  
AMERICAN CIVIL  
LIBERTIES  
UNION FOUNDATION OF  
TEXAS  
5225 Katy Fwy., Suite 350  
Houston, Texas 77007

Chase Strangio  
James Esseks  
Anjana Samant  
Kath Xu  
AMERICAN CIVIL  
LIBERTIES  
UNION FOUNDATION  
125 Broad Street, 18th Floor  
New York, New York 10004

Derek R. McDonald  
Maddy R. Dwertman  
David B. Goode  
BAKER BOTTS L.L.P.  
98 San Jacinto Boulevard,  
Suite 1500  
Austin, Texas 78701-4078

Ryan G. Kercher  
Courtney Corbello  
Assistant Attorney General  
Office of the Attorney  
General  
P.O. Box 12548, Capitol  
Station  
Austin, Texas 78711-2548

## APPENDIX A: LIST OF *AMICI*

**Roy L. Austin, Jr.**

Former Deputy Assistant Attorney General, Civil Rights Division, U.S.  
Department of Justice  
Former Deputy Assistant to President Obama for the Office of Urban Affairs,  
Justice, and Opportunity (White House Domestic Policy Council)

**Diana Becton**

District Attorney, Contra Costa County, California

**Wesley Bell**

Prosecuting Attorney, St. Louis County, Missouri

**Buta Biberaj**

Commonwealth's Attorney, Loudoun County, Virginia

**Richard Biehl**

Former Chief, Dayton Police Department, Ohio

**Shay Bilchik**

Director Emeritus, Center for Juvenile Justice Reform, McCourt School of Public  
Policy, Georgetown University  
Former Associate Deputy Attorney General, U.S. Department of Justice  
Former Administrator, Office of Juvenile Justice and Delinquency Prevention, U.S.  
Department of Justice  
Former Chief Assistant State Attorney, Miami-Dade County, Florida

**Sherry Boston**

District Attorney, DeKalb County, Georgia

**Chesa Boudin**

Former District Attorney, City and County of San Francisco, California

**RaShall Brackney, Ph.D.**

Former Chief, Charlottesville Police Department, Virginia

**Alvin Bragg**

District Attorney, New York County (Manhattan), New York

**Joseph Brann**

Former Chief, Hayward Police Department, California  
Former Director, Office of Community Oriented Policing Services, U.S.  
Department of Justice

**Aisha Braveboy**

State's Attorney, Prince George's County, Maryland

**Bobbe J. Bridge**

Former Justice, Supreme Court, Washington

**Jim Bueermann**

Former Chief, Redlands Police Department, California  
Former President, National Police Foundation

**Leevin Camacho**

Attorney General, Guam

**Doug Chin**

Former Lieutenant Governor, Hawaii  
Former Attorney General, Hawaii

**John Choi**

County Attorney, Ramsey County (St. Paul), Minnesota

**Jerry Clayton**

Sheriff, Washtenaw County (Ann Arbor), Michigan

**Dave Clegg**

District Attorney, Ulster County, New York

**Laura Conover**

County Attorney, Pima County (Tucson), Arizona

**Brendan Cox**

Former Chief, Albany Police Department, New York

**John Creuzot**

District Attorney, Dallas County, Texas

**Satana Deberry**

District Attorney, Durham County, North Carolina

**Parisa Dehghani-Tafti**

Commonwealth's Attorney, Arlington County and the City of Falls Church, Virginia

**Steve Descano**

Commonwealth's Attorney, Fairfax County, Virginia

**Michael Dougherty**

District Attorney, 20<sup>th</sup> Judicial District (Boulder), Colorado

**Mark Dupree**

District Attorney, Wyandotte County (Kansas City), Kansas

**Matt Ellis**

District Attorney, Wasco County, Oregon

**Keith Ellison**

Attorney General, Minnesota

**Ramin Fatehi**

Commonwealth's Attorney, City of Norfolk, Virginia

**Lisa Foster**

Former Judge, Superior Court, California

Former Director, Office of Access to Justice, U.S. Department of Justice

**Kimberly M. Foxx**

State's Attorney, Cook County (Chicago), Illinois

**William Royal Furgeson, Jr.**

Former Judge, U.S. District Court, Western District of Texas

**Gil Garcetti**

Former District Attorney, Los Angeles County, California

**Kimberly Gardner**

Circuit Attorney, City of St. Louis, Missouri

**Stan Garnett**

Former District Attorney, 20<sup>th</sup> Judicial District (Boulder), Colorado

**Delia Garza**

County Attorney, Travis County (Austin), Texas

**José Garza**

District Attorney, Travis County (Austin), Texas

**George Gascón**

District Attorney, Los Angeles County, California

Former District Attorney, City and County of San Francisco, California

Former Chief, San Francisco Police Department, California

Former Chief, Mesa Police Department, Arizona

**Sarah F. George**

State's Attorney, Chittenden County (Burlington), Vermont

**Nancy Gertner**

Former Judge, U.S. District Court, District of Massachusetts

**Sim Gill**

District Attorney, Salt Lake County, Utah

**Diane Goldstein**

Executive Director, Law Enforcement Action Partnership (LEAP)

**Joe Gonzales**

District Attorney, Bexar County (San Antonio), Texas

**Deborah Gonzalez**

District Attorney, Western Judicial Circuit (Athens), Georgia

**Eric Gonzalez**

District Attorney, Kings County (Brooklyn), New York

**Mark Gonzalez**

District Attorney, Nueces County (Corpus Christi), Texas

**Emily Jane Goodman**

Former Justice, Supreme Court, New York

**Kristin Graziano**

Sheriff, Charleston County, South Carolina

**Andrea Harrington**

District Attorney, Berkshire County, Massachusetts

**David J. Hickton**

Former U.S. Attorney, Western District of Pennsylvania

**John Hummel**

District Attorney, Deschutes County, Oregon

**Elizabeth K. Humphries**

Commonwealth's Attorney, City of Fredericksburg, Virginia

**Natasha Irving**

District Attorney, 6<sup>th</sup> Prosecutorial District, Maine

**Kathleen Jennings**

Attorney General, Delaware

**Steven Kirkland**

Former Judge, U.S. District Court, District of Texas

**Zach Klein**

City Attorney, Columbus, Ohio

**Justin F. Kollar**

Former Prosecuting Attorney, County of Kaua'i, Hawaii

**Lawrence Krasner**

District Attorney, Philadelphia, Pennsylvania

**Miriam Aroni Krinsky**

Former Assistant U.S. Attorney, Criminal Appellate Chief, and General Crimes Chief, U.S. Attorney's Office for the Central District of California

Former Chair, Solicitor General's Advisory Group on Appellate Issues

**Rebecca Like**

Prosecuting Attorney, County of Kaua'i, Hawaii

**Karen Loeffler**

Former U.S. Attorney, District of Alaska

**Patricia A. Madrid**

Former Attorney General, New Mexico

**Brian S. Mason**

District Attorney, 17<sup>th</sup> Judicial District, Colorado

**Howard Matz**

Former Judge, U.S. District Court, Central District of California

**Beth McCann**

District Attorney, 2<sup>nd</sup> Judicial District (Denver), Colorado

**Garry L. McFadden**

Sheriff, Mecklenburg County (Charlotte), North Carolina

**Charmaine McGuffey**

Sheriff, Hamilton County, Ohio

**Barbara McQuade**

Former U.S. Attorney, Eastern District of Michigan

**Christian D. Menefee**

County Attorney, Harris County (Houston), Texas

**Spencer Merriweather**

District Attorney, Mecklenburg County (Charlotte), North Carolina

**Brian Middleton**

District Attorney, Fort Bend County, Texas

**Jody Owens**

District Attorney, Hinds County, Mississippi

**Alonzo Payne**

Former District Attorney, 12<sup>th</sup> Judicial District (San Luis), Colorado

**Joseph Platania**

Commonwealth's Attorney, City of Charlottesville, Virginia

**Richard Pocker**

Former U.S. Attorney, District of Nevada

**Abdul D. Pridgen**

Chief, San Leandro Police Department, California

Former Chief, Seaside Police Department, California

**Karl A. Racine**

Attorney General, District of Columbia

**Kwame Raoul**

Attorney General, Illinois

**Ira Reiner**

Former District Attorney, Los Angeles County, California

Former City Attorney, Los Angeles, California

**Eric Rinehart**

State's Attorney, Lake County, Illinois

**Mimi Rocah**

District Attorney, Westchester County, New York

**Jeff Rosen**

District Attorney, Santa Clara County, California

**Marian Ryan**

District Attorney, Middlesex County, Massachusetts

**Dan Satterberg**

Prosecuting Attorney, King County (Seattle), Washington

**Eli Savit**

Prosecuting Attorney, Washtenaw County (Ann Arbor), Michigan



**Shira A. Scheindlin**

Former Judge, U.S. District Court, Southern District of New York

**Mike Schmidt**

District Attorney, Multnomah County (Portland), Oregon

**Carol Siemon**

Prosecuting Attorney, Ingham County (Lansing), Michigan

**David Soares**

District Attorney, Albany County, New York

**Eric Sparr**

District Attorney, Winnebago County, Wisconsin

**Norm Stamper**

Former Chief, Seattle Police Department, Washington

**Darrel Stephens**

Former Executive Director, Major City Chiefs Association

Former Chief, Charlotte-Mecklenburg Police Department, North Carolina

**Jack Stollsteimer**

District Attorney, Delaware County, Pennsylvania

**David Sullivan**

District Attorney, Northwestern District, Massachusetts

**Shannon Taylor**

Commonwealth's Attorney, Henrico County, Virginia

**Carolyn Engel Temin**

Former Judge, 1<sup>st</sup> Judicial District, Pennsylvania

**Scott Thomson**

Former Chief, Camden Police Department, New Jersey

Former President, Police Executive Research Forum

**Steven Tompkins**

Sheriff, Suffolk County (Boston), Massachusetts

**Raúl Torrez**

District Attorney, Bernalillo County (Albuquerque), New Mexico

**Suzanne Valdez**

District Attorney, Douglas County (Lawrence), Kansas

**Matthew Van Houten**

District Attorney, Tompkins County, New York

**Joyce Vance**

Former U.S. Attorney, Northern District of Alabama

**Andrew Warren**

State Attorney, 13<sup>th</sup> Judicial Circuit (Tampa), Florida

**Seth Waxman**

Former Solicitor General, U.S. Department of Justice

**Organizations**

**Law Enforcement Action Partnership (LEAP)**

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

Associated Case Party: Ronald Beal

Name	BarNumber	Email	TimestampSubmitted	Status
Ronald Beal		ron_beal@baylor.edu	7/25/2022 9:55:23 AM	SENT

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

Associated Case Party: American Professional Society on the Abuse of Children and Eight Child Advocacy Organizations

Name	BarNumber	Email	TimestampSubmitted	Status
Greg R.Wehrer		greg.wehrer@squirepb.com	7/25/2022 9:55:23 AM	SENT

## Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Paul Castillo	24049461	pcastillo@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Madeleine Dwertman	24092371	maddy.dwertman@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Derek Raymond McDonald	786101	derek.mcdonald@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Shelly L. Skeen	24010511	slskeen@gmail.com	7/25/2022 9:55:23 AM	SENT
David Goode	24106014	david.goode@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Andre Segura	24107112	asegura@aclutx.org	7/25/2022 9:55:23 AM	SENT
Brian Klosterboer	24107833	bklosterboer@aclutx.org	7/25/2022 9:55:23 AM	SENT
Maria Williamson		maria.williamson@oag.texas.gov	7/25/2022 9:55:23 AM	SENT
Savannah Kumar	24120098	skumar@aclutx.org	7/25/2022 9:55:23 AM	SENT
Brandt Roessler	24127923	brandt.roessler@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Currey Cook		ccook@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Camilla Taylor		ctaylor@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Chase Strangio		cstrangio@aclu.org	7/25/2022 9:55:23 AM	SENT
James Esseks		jesseks@aclu.org	7/25/2022 9:55:23 AM	SENT
Shelly Skeen		sskeen@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Kath Xu		kxu@aclu.org	7/25/2022 9:55:23 AM	SENT
Ryan Kercher		ryan.kercher@oag.texas.gov	7/25/2022 9:55:23 AM	SENT
Greg Wehrer		Greg.Wehrer@squirepb.com	7/25/2022 9:55:23 AM	SENT
Rafael Langer-Osuna		rafael.langerosuna@squirepb.com	7/25/2022 9:55:23 AM	SENT
Mary KellyPersyn		marykelly@persynlaw.com	7/25/2022 9:55:23 AM	SENT
Karen Loewy		kloewy@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Ana Saldana		asaldana@reedsmith.com	7/25/2022 9:55:23 AM	SENT
Amalia YSax-Bolder		asax-bolder@bhfs.com	7/25/2022 9:55:23 AM	SENT
Martha LFitzgerald		mfitzgerald@bhfs.com	7/25/2022 9:55:23 AM	SENT
Craig MFinger		cfinger@bhfs.com	7/25/2022 9:55:23 AM	SENT

## Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

Associated Case Party: Greg Abbott

Name	BarNumber	Email	TimestampSubmitted	Status
Judd Stone	24076720	judd.stone@oag.texas.gov	7/25/2022 9:55:23 AM	SENT
Natalie Thompson	24088529	natalie.thompson@oag.texas.gov	7/25/2022 9:55:23 AM	SENT
Ryan Kercher		ryan.kercher@oag.texas.gov	7/25/2022 9:55:23 AM	SENT
Courtney Corbello		courtney.corbello@oag.texas.gov	7/25/2022 9:55:23 AM	SENT

## Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

Associated Case Party: Jane Doe

Name	BarNumber	Email	TimestampSubmitted	Status
Nischay Bhan	24105468	Nischay.bhan@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Michele Clanton-Lockhart		mclanton@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Paul Castillo		pcastillo@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
John Ormiston	24121040	john.ormiston@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Omar Gonzalez-Pagan		ogonzalez-pagan@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Nicholas Guillory		nguillory@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Anjana Samant		asamant@aclu.org	7/25/2022 9:55:23 AM	SENT
Stephen Paul		spaul@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Brian Klosterboer		bklosterboer@aclutx.org	7/25/2022 9:55:23 AM	SENT
Maddy Dwertman		maddy.dwertman@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Currey Cook		ccook@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Camilla Taylor		ctaylor@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Chase Strangio		cstrangio@aclu.org	7/25/2022 9:55:23 AM	SENT
James Esseks		jesseks@aclu.org	7/25/2022 9:55:23 AM	SENT
Kath Xu		kxu@aclu.org	7/25/2022 9:55:23 AM	SENT
Savannah Kumar		skumar@aclutx.org	7/25/2022 9:55:23 AM	SENT
Andre Segura		asegura@aclutx.org	7/25/2022 9:55:23 AM	SENT
Brandt Roessler		brandt.roessler@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
David Goode		david.goode@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Shelly L.Skeen		ssskeen@lambdalegal.org	7/25/2022 9:55:23 AM	ERROR
Sharon McGowan		smcgowan@lambdalegal.org	7/25/2022 9:55:23 AM	ERROR
Derek McDonald		derek.mcdonald@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Raylynn Howell		Raylynn.Howell@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Stacy Benson		Stacey.Benson@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Christine Choi		cchoi@aclu.org	7/25/2022 9:55:23 AM	SENT
Carolina Caicedo		ccaicedo@aclu.org	7/25/2022 9:55:23 AM	SENT
Parul Aggarwal		Parul.aggarwal@bakerbotts.com	7/25/2022 9:55:23 AM	SENT
Maia Zelkind		mzelkind@lambdalegal.org	7/25/2022 9:55:23 AM	SENT
Shelly Skeen		slskeen@gmail.com	7/25/2022 9:55:23 AM	SENT

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

Associated Case Party: Texas Medical Association

Name	BarNumber	Email	TimestampSubmitted	Status
Donald Wilcox		rocky.wilcox@texmed.org	7/25/2022 9:55:23 AM	SENT
Kelly Walla		kelly.walla@texmed.org	7/25/2022 9:55:23 AM	SENT
Eamon Reilly		eamon.reilly@texmed.org	7/25/2022 9:55:23 AM	SENT



### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Alan York

Bar No. 22167500

ayork@reedsmith.com

Envelope ID: 66617937

Status as of 7/25/2022 10:11 AM CST

Associated Case Party: RoyLAustin

Name	BarNumber	Email	TimestampSubmitted	Status
Alan York		ayork@reedsmith.com	7/25/2022 9:55:23 AM	SENT