

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

JANE DOE, et al.,

Plaintiffs,

v.

JAMES R. MCHENRY III, in his official  
capacity as Acting Attorney General of the  
United States; WILLIAM LOTHROP, in his  
official capacity as Acting Director of the  
Federal Bureau of Prisons,

Defendants.

Case No.: 1:25-cv-00286

**DECLARATION OF EVE HILL IN SUPPORT OF  
PLAINTIFFS' MOTIONS FOR A TEMPORARY RESTRAINING  
ORDER/PRELIMINARY INJUNCTION AND TO  
PROCEED UNDER PSEUDONYM, PARTIALLY SEAL THE RECORD,  
AND FOR A PROTECTIVE ORDER**

I, Eve Hill, of full age, do hereby declare as follows:

1. I am an attorney in good standing with the District of Columbia Bar and licensed to practice law in the District of Washington, D.C.

2. I make the following declaration based on personal knowledge and pursuant to F.R.C.P. 65(b).

3. Plaintiff Jane Doe is a transgender woman who has taken hormones [REDACTED], has been housed in a women's facility [REDACTED]. She faces imminent transfer to a men's prison and immediate cessation of medically-necessary treatment for gender dysphoria.

4. Plaintiff May Doe is a transgender woman who has taken hormones [REDACTED], [REDACTED], and has been housed in a women's facility for [REDACTED].

[REDACTED]. She faces imminent transfer to a men's prison and immediate cessation of medically-necessary treatment for gender dysphoria.

5. Plaintiff Sara Doe is a transgender woman who has lived as a woman and taken hormones [REDACTED]. She has been housed in a women's facility [REDACTED]. She faces imminent transfer to a men's prison and immediate cessation of medically-necessary treatment for gender dysphoria.

6. Plaintiffs file this Emergency Motion for a Temporary Restraining Order, which seeks to preserve the status quo prior to January 20, 2025, when Executive Order 14166 was issued, while the parties litigate the lawfulness of certain provisions of the Executive Order. Because of the serious risk of irreparable harm, the imminence of the transfer, and the time sensitivity involved in getting immediate relief from this Court, Plaintiffs' counsel filed the Emergency Motion ex parte and without notice to Defendants. However, Plaintiffs' counsel will send the Complaint and Emergency Motion for Temporary Restraining Order and Preliminary Injunction to the United States Attorney for the District of Columbia and the Attorney General by email.

7. In conjunction with the Complaint and Emergency Motion, Plaintiffs' counsel also filed a Motion To Proceed Under a Pseudonym, To Partially Seal Documents, and for a Protective Order. This motion is based on the specific potential harms that would follow from revealing Plaintiffs' identities, including the potential risk to them of violence in the corrections system and the violation of their interests in maintaining privacy of their medical status, history, and records.

8. All redactions proposed for the partially sealed documents stem from the necessity to protect their identities, as set forth below.

9. The locations and dates of the Plaintiffs' current and former correctional facilities are redacted because of the limited number of incarcerated transgender women at those facilities. If the facilities and time periods when Plaintiffs were there were identified, Plaintiffs' identities could be easily surmised from among a small number of transgender women at those facilities.

10. Specific biographical details concerning Plaintiffs are redacted, including their current and former names and dates of birth. Any one of these details would also provide an easy means of identification with minimal internet or public records research.

11. Details of Plaintiffs' medical records, medical treatment, and mental health issues outside of their gender dysphoria treatment are redacted because the confluence of these records would serve to easily identify Plaintiffs to those that are aware of their other medical diagnosis/diagnoses.

12. Certain details about Plaintiffs' time in federal correctional facilities are redacted, including the period of their incarceration, any disciplinary record, harms they experienced, rehabilitation activities, and medical care they have received. Individuals within the correctional facility or those with whom they might communicate are likely aware of these details of Plaintiffs' time in federal custody and would be able to guess their identities if they were left unredacted.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: January 30, 2025

  
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Eve L. Hill