

Paul Carlos Southwick (ISB No. 12439)  
Emily Myrei Croston (ISB No. 12389)  
ACLU of Idaho Foundation  
P.O. Box 1897  
Boise, ID 83701  
Tel: (208) 344-9750  
[psouthwick@acluidaho.org](mailto:psouthwick@acluidaho.org)  
[ecroston@acluidaho.org](mailto:ecroston@acluidaho.org)

Chase B. Strangio\*  
Malita Picasso (*admitted pro hac vice*)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad St.  
New York, NY 10004  
Tel: (212) 549-2584  
[cstrangio@aclu.org](mailto:cstrangio@aclu.org)  
[mpicasso@aclu.org](mailto:mpicasso@aclu.org)

\*To be admitted *pro hac vice*

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

**JANE POE, et al.,**

*Plaintiffs,*

v.

**RAÚL LABRADOR, et al.,**

*Defendants.*

Case No. 1:24-cv-00306-DCN

**PAUL SOUTHWICK  
DECLARATION ISO  
PLAINTIFFS' REPLY  
ISO PLAINTIFFS'  
MOTION FOR  
TEMPORARY  
RESTRAINING ORDER,  
PROVISIONAL CLASS  
CERTIFICATION AND  
PRELIMINARY  
INJUNCTION (Dkt. #2)**

I, Paul Southwick, hereby declare as follows:

1. I offer this Declaration in support of Plaintiffs' Motion for a Temporary Restraining Order, Provisional Class Certification, and Preliminary Injunction.
2. I have personal knowledge of the facts set forth herein, and could and would testify competently to these facts if called as a witness.
3. Attached as Exhibit A is a true and accurate copy of the IDOC Policy pertaining to the treatment of incarcerated persons with gender dysphoria: *Gender Dysphoria: Healthcare for Inmates with*, No. 401.06.03.501.
4. Attached as Exhibit B is a true and accurate copy of excerpts of the August 16, 2023 Hearing Testimony of Dr. James Cantor in the case of *Loe, et al. v. Texas, et al.*, Cause No. D-1-GN-23-003616 (District Court of Texas, Travis County).
5. Attached as Exhibit C is a true and accurate copy of excerpts of the May 6, 2022 Hearing Testimony of Dr. James Cantor in the case of *Eknes-Tucker, et al. v. Ivey, et al.*, Case No. 2:22-cv-00184-LCB-CWB (M.D. Alabama) (Dkt. 105).
6. Attached as Exhibit D is a true and accurate copy of excerpts of the June 20, 2024 Deposition Testimony of Dr. James Cantor in the case of *Moe, et al. v. Yost, et al.*, Case No. 24-cv-002481 (Court of Common Pleas, Franklin County, Ohio).
7. Attached as Exhibit E is a true and accurate copy of excerpts of the September 2, 2022 Deposition Testimony of Dr. Michael K. Laidlaw in the case of *C.P., et al. v. Blue Cross Blue Shield of Illinois*, 3:20-cv-06145-RJB (W.D. Wash.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 9, 2024 in Boise, Idaho.

/s/ Paul Southwick

Paul Southwick