

# EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

REIYN KEOHANE, SASHA :  
MENDOZA, SHEILA DIAMOND, :  
KARTER JACKSON, :  
NELSON BOOTHE, :

*Plaintiffs,* :

v. :

Case No. 4:24-cv-434-AW-MAF

RICKY D. DIXON, in his :  
official capacity as Secretary :  
of the Florida Department of :  
Corrections; CLAYTON WEISS :  
in his official capacity as Health :  
Services Director of the Florida :  
Department of Corrections; :  
GARY HEWETT, in his official :  
capacity as Warden of :  
Wakulla Correctional Institution, :  
ALONZO HORNER, in his :  
official capacity as Warden of :  
Homestead Correctional Institution; :  
and NAN JEFFCOAT, in her official :  
capacity as Warden of Florida :  
Women's Reception Center, :

*Defendants.* :

**DECLARATION OF LI NOWLIN-SOHL IN SUPPORT OF  
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

My name is Li Nowlin-Sohl. I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare:

1. I am a Senior Staff Attorney with the American Civil Liberties Union Foundation (“ACLU”) and am Counsel of Record for Plaintiffs in this case.
2. I graduated from New York University School of Law and am admitted to practice in the State of Washington, where I am a member in good standing. I am admitted to the bars of multiple U.S. District Courts, the Ninth Circuit Court of Appeals, and to the U.S. Supreme Court.
3. I submit this declaration in support of Plaintiffs’ Motion for Class Certification and to seek the appointment of the ACLU to serve as co-counsel for the proposed class, along with counsel from American Civil Liberties Union of Florida Foundation (“ACLU-FL”) and Steptoe LLP. (Counsel at each of ACLU-FL and Steptoe LLP will submit a separate declaration in support of their request to serve as class counsel).
4. My qualifications to serve as class counsel include that I was in private practice at the firm of Paul Hastings LLP for three years from 2011 to 2014, during which time I handled a wide range of civil litigation matters. I then served as a clerk for the Honorable Judge Gladys Kessler at the U.S. District Court for the District of Columbia. Prior to joining ACLU’s LGBTQ & HIV

Project, I worked for five years with the ACLU of Washington and for one year with the class action law firm of Keller Rohrback LLP.

5. Over the course of my career, I have represented LGBTQ+ individuals to assert a variety of legal claims and defenses, including cases that assert violations of the Eighth Amendment right to necessary medical care for prisoners.
6. I will be assisted on this matter by my ACLU colleagues, Leslie Cooper, Deputy Director of the ACLU LGBTQ & HIV Project and graduate of New York University School of Law, and Michelle Fraling, a Skadden Fellow at the ACLU Ruth Bader Ginsburg Center for Liberty and graduate of Yale Law School.
7. The ACLU is a nationwide, nonprofit, nonpartisan organization that is dedicated to defending the principles of liberty, equality, and justice embodied in the Constitution and this nation's civil rights laws. Throughout its more than 100-year history, the ACLU has been deeply involved in protecting the rights of incarcerated people and LGBTQ people.
8. The LGBTQ & HIV Project of the ACLU, founded in 1986, is dedicated to safeguarding the constitutional and civil rights of LGBTQ people and those living with HIV. The Project's attorneys have litigated a wide variety of cases across the country involving the constitutional and civil rights of transgender

people. The Project has been counsel in two cases before the U.S. Supreme Court involving transgender rights—*Bostock v. Clayton Cnty.*, 590 U.S. 644 (2020) (holding that Title VII covers discrimination based on transgender status) and *United States v. Skrametti*, Case No. 23-477 (U.S.) (pending) (challenge to state law banning gender-affirming medical care for minors)—and numerous cases before federal district courts and courts of appeals. *See, e.g., Poe v. Labrador*, No. 1:23-cv-00269-BLW (9th Cir.) (pending); *Hecox v. Little*, 104 F.4th 1061 (9th Cir. 2024); *Soule v. Conn. Ass’n of Sch., Inc.*, 90 F.4th 34 (2d Cir. 2023); *Brandt v. Rutledge*, 47 F.4th 661 (8th Cir. 2022); *Grimm v. Gloucester Cnty Sch. Bd.*, 972 F.3d 586 (4th Cir. 2020); *Doe v. Boyertown Area Sch. Dist.*, 897 F.3d 518 (3d Cir. 2018).

9. Recent examples where the ACLU LGBTQ & HIV Project has litigated challenges to denial of health care to incarcerated transgender people include: *Zayre-Brown v. N.C. Dep’t of Pub. Safety*, No. 3:22-cv-191-MOC-DCK, 2024 WL 410243 (W.D.N.C. Feb. 2, 2024); *Iglesias v. Fed. Bureau of Prisons*, Case No. 19-CV-415-NJR, 2021 WL 6112790 (S.D. Ill. Dec. 27, 2021); *Keohane v. Fla. Dep’t of Corr. Sec.*, 952 F.3d 1257 (11th Cir. 2020); and *Fields v. Smith*, 653 F.3d 550 (7th Cir. 2011).
10. The ACLU is also actively engaged in other class action litigation on behalf of incarcerated transgender individuals in *Kingdom v. Trump*, No. 1:25-cv-

0069 (D.D.C., March 7, 2025) (pending) and *Robinson v. Labrador*, No. 1:24-cv-00306-DCN (D. Idaho Sep. 3, 2024) (pending).

11. ACLU has been working for over six months on this matter since it filed the initial complaint on October 25, 2025. My colleagues and I have dedicated many hours and significant financial resources to the investigation and research of Plaintiffs' claims – including interviewing Plaintiffs and other members of the proposed class to develop the factual record and legal issues underlying this case, reviewing documents provided by our clients and Defendants, interviewing potential expert witnesses, performing legal research about potential claims and relief available to the class, and drafting, *inter alia*, a lengthy and detailed amended complaint, a motion for temporary and preliminary relief, and this class certification motion.

12. The ACLU has dedicated, and will continue to commit, substantial resources to the representation of the Plaintiffs and all putative members in this case.

I, Li Nowlin-Sohl, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: April 9, 2025

/s/ Li Nowlin-Sohl

**Li Nowlin-Sohl**

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Putative Class*