

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

E.K. and S.K., minors, by and through their parent and next friend LINDSEY KEELEY; O.H., S.H., and H.H., minors, by and through their parent and next friend JESSICA HENNINGER; E.G., a minor, by and through his parent and next friend MEGAN JEBELES; E.Y. and C.Y., minors, by and through their parent and next friend ANNA YOUNG; L.K., L.K., and L.K., minors, by and through their parent and next friend ANNA KENKEL; and M.T., a minor, by and through her parent and next friend NATALIE TOLLEY,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE  
EDUCATION ACTIVITY; DR. BETH  
SCHIAVINO-NARVAEZ, in her official  
capacity as Director of the Department of  
Defense Education Activity; and PETER  
BRIAN HEGSETH, in his official capacity as  
Secretary of Defense,

Defendants.

Case No. 1:25-cv-00637-PTG-IDD

Hon. Patricia Tolliver Giles

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**Ex. 1**, Department of Defense Education Activity, *2024-2025 DoDEA By the Numbers Fact Sheet* (Nov. 2024), <https://dodea.widen.net/s/hwlwrrdfc5/dodea-by-the-numbers-placemat-sy-22-23>.

**Ex. 2**, Department of Defense Education Activity, *School Awards Page*, <https://www.dodea.edu/education/school-awards>.

**Ex. 3**, Department of Defense Education Activity, *DoD Schools Ranked Best in the United States Again on Nation’s Report Card* (Jan. 29, 2025), <https://www.dodea.edu/news/press-releases/dod-schools-ranked-best-united-states-again-nations-report-card>.

**Ex. 4**, Michael O’Day, *DoDEA Students Lead Nation in NAEP Performance, Again Showcasing the Strength of 21st Century Education Model*, U.S. Army (Feb. 3, 2025), [https://www.army.mil/article/282980/dodea\\_students\\_lead\\_nation\\_in\\_naep\\_performance\\_again\\_showcasing\\_the\\_strength\\_of\\_21st\\_century\\_education\\_model](https://www.army.mil/article/282980/dodea_students_lead_nation_in_naep_performance_again_showcasing_the_strength_of_21st_century_education_model).

**Ex. 5**, Executive Order No. 14168, 90 Fed. Reg. 8615, *Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (Jan. 20, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/>.

- Ex. 6**, Executive Order No. 14185, 90 Fed. Reg. 8763, *Restoring America's Fighting Force* (Jan. 27, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/restoring-americas-fighting-force/>.
- Ex. 7**, Executive Order No. 14190, 90 Fed. Reg. 8853, *Ending Radical Indoctrination in K-12 Schooling* (Jan. 29, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-indoctrination-in-k-12-schooling/>.
- Ex. 8**, The White House, Remarks by President Trump in Joint Address to Congress (Mar. 6, 2025), <https://www.whitehouse.gov/remarks/2025/03/remarks-by-president-trump-in-joint-address-to-congress/>.
- Ex. 9**, Email from Shawn Knudsen, Principal of DoDEA Wiesbaden Middle School in Wiesbaden, Germany, to Wiesbaden MS All Staff (Feb. 7, 2025).
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- Ex. 11**, Letter from Charles Kelker, DoDEA Europe Chief of Staff, to DoDEA Europe Administrators and School-level Employees (Feb. 7, 2025).
- Ex. 12**, Letter from Beth Schiavino-Narvaez, DoDEA Director, to DoDEA Sponsors, Parents, and Guardians (Feb. 10, 2025).
- Ex. 13**, DoDEA, Training: Information Centers and Executive Orders, [https://rise.articulate.com/share/Co7fkmnPI6eyrWDe00At1Votq7bwAhcH#](https://rise.articulate.com/share/Co7fkmnPI6eyrWDe00At1Votq7bwAhcH#/).
- Ex. 14**, List of books currently removed from school libraries and curricula.
- Ex. 15**, Letter from Michelle Howard-Brahaney, DoDEA Europe Director for Student Excellence (Mar. 7, 2025).
- Ex. 16**, Peter Hegseth, Secretary of Defense, *Identity Months Dead at DoD* (Jan. 31, 2025), <https://www.defense.gov/News/Releases/Release/article/4050331/identity-months-dead-at-dod/>.
- Ex. 17**, Taylor York, DoDEA Civil Rights Analyst and Program Manager, Guidance on Cultural Observances and Compliance with SECDEF Directive (Feb. 14, 2025).
- Ex. 18**, Peter Hegseth, Secretary of Defense, Memorandum: Restoring America's Fighting Force (Jan. 29, 2025).
- Ex. 19**, Lori Pickel, Acting Chief Academic Officer for DoDEA, Memorandum: Administrative Operational Compliance Review of DoDEA Adopted Instructional Resources Related to Gender and/or Discriminatory Equity Ideology Topics (Feb. 5, 2025).

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