

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CARTER COE, by and through his parent
and next friend, CAROLINE COE; et al., *on
behalf of themselves and all similarly
situated,*

Plaintiffs,

v.

TODD BLANCHE, in his official capacity as
Acting Attorney General of the United States;
et al.,

Defendants.

Case No. 1:26-cv-04641-JAV

DECLARATION OF NORMAN NOE

I, Norman Noe, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Norman Noe.
2. I am over 18 years old, have personal knowledge of the facts set forth in this Declaration, and will testify competently to those facts if called as a witness.
3. I am a Plaintiff in this action. I am bringing claims on behalf of my child, Nicole Noe, as her parent and next friend.
4. I offer this Declaration in support of Plaintiffs' Motions to Proceed Under a Pseudonym, for a Temporary Restraining Order, and for Class Certification.
5. I am the parent of a minor child, Nicole Noe, who is transgender. We are residents of Brooklyn, New York.
6. Norman Noe and Nicole Noe are pseudonyms.
7. I am submitting this declaration under pseudonyms for my child and I because I fear that disclosure of our identities would subject me and my family to a substantial risk of harm,

including harassment, violence, and retaliation, and would also reveal the identity of my child who is a minor.

8. As a family, we are aware that transgender people are subject to inordinate and disproportionate amounts of violence, harassment, and discrimination. I am also aware of targeted violence as a direct response to the provision of gender-affirming medical care to minors. Accordingly, I am concerned that making our identities public would endanger our safety and subject my family and I to violence and harassment.

9. In addition, I am concerned that public identification could expose my family and I to retaliation by the current administration. Based on media reports, I am aware that the current federal administration has targeted those who support transgender care or oppose the administration's priorities.

10. I have read the proposed class definition in the complaint. I am willing to act on and be named on behalf of Nicole Noe as a class representative, and act on behalf of other persons in the class similarly situated to Nicole Noe. If appointed, I will look out for the interests of all class members. I am not aware of any conflict I may have with any proposed class members.

11. My child received gender-affirming medical care at NYU Langone Hospital within the time range between January 1, 2020 and May 5, 2026. That care included puberty blocking medications as well as estrogen to treat gender dysphoria.

12. In May, I received a message from NYU Langone indicating to me that the hospital had received a grand jury subpoena from the U.S. Attorneys' Office in the Northern District of Texas and that Nicole's private medical information was subject to being disclosed.

13. I do not consent to any such disclosure.

14. Throughout the period that Nicole has been obtaining medical care at NYU, she has had to undergo many tests and assessments, including a full neurocognitive exam as part of the process of assessing her to initiate medical treatment. She has also had to undergo blood tests, and we have shared a great deal of her personal and sensitive medical information with her medical providers at NYU. All of this information was given to NYU on the understanding it would be kept confidential. Now, I am horrified at the possibility of this information being disclosed by the hospital.

15. We trust Nicole's medical providers with her care, and that trust allowed us to feel comfortable having open conversations with them about her and her care. But now, my trust in our ability as a family to have frank and open conversations with Nicole's doctors, without having to worry whether that information will be turned over or made public, is shaken.

16. I feel our privacy rights are being violated. If our private medical information is turned over, I am worried that it might end up being made public or revealed in some way, and I worry about vigilantism or harassment from those who oppose families like mine.

17. I also worry that the true goal of actions like the subpoena, seeking the information of families like mine, is to make families apprehensive about seeking out care or moving forward with treatment for fear of being targeted or having their private information turned over.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on: May 30 2026

By:

Norman Noe
Norman Noe