

No. 16-273

In the Supreme Court of the United States

GLOUCESTER COUNTY SCHOOL BOARD,
Petitioner,

v.

G. G., BY HIS NEXT FRIEND AND MOTHER, DEIRDRE GRIMM,
Respondent.

*On Writ of Certiorari to the
United States Court of Appeals for the Fourth Circuit*

JOINT APPENDIX

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January 3, 2017

Petition for Writ of Certiorari filed August 29, 2016
Petition for Writ of Certiorari granted October 28, 2016

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RELEVANT DOCKET ENTRIES**United States District Court for the
Eastern District of Virginia (Newport News)
4:15-cv-00054-RGD-DEM***G.G. v. Gloucester County School Board*

Date Filed	#	Docket Text
06/11/2015	2	Sealed Complaint per 1 Order entered on 6.16.15. (Attachments: # 1 Exhibit A) # 2 Civil Cover Sheet, # 3 Letter, # 4 Receipt) (epri). (Entered: 06/16/2015)
06/11/2015	3	Sealed Declaration of G.G. Document re 2 Sealed Complaint. (Attachments: # 1 Exhibit A)(epri) (Entered: 06/16/2015)
06/11/2015	4	Sealed Expert Declaration of Randi Ettner, Ph.D. re 2 Sealed Complaint. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(epri) (Entered: 06/16/2015)
06/11/2015	5	SEALED PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION, by G. G. (epri) (Entered: 06/16/2015)
06/11/2015	6	SEALED PLAINTIFF'S MOTION FOR LEAVE TO FILE BRIEF IN EXCESS OF THIRTY PAGES by G. G. (epri) (Entered: 06/16/2015)

06/11/2015	7	Sealed Memorandum in Support of Plaintiff's Motion for Leave to File a Brief in Excess of Thirty Pages re 5 SEALED PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION, by G. G 6 SEALED PLAINTIFF'S MOTION FOR LEAVE TO FILE BRIEF IN EXCESS OF THIRTY PAGES by G. G. (Attachments: # 1 Proposed Memorandum of law in support of Plaintiff's Motion for Preliminary Injunction)(epri) (Entered: 06/16/2015)
06/11/2015	8	COMPLAINT (Redacted) against Gloucester County School Board (Filing fee \$ 400, receipt number 24683027454.), filed by G. G. (Attachments: # 1 Civil Cover Sheet (Redacted), # 2 Letter (Redacted), # 3 Receipt)(epri) (Entered: 06/16/2015)
06/11/2015	9	Declaration of G. G. re 8 Complaint (epri) (Entered: 06/16/2015)
06/11/2015	10	Expert Declaration of Randi Ettner, Ph.D Preliminary Statement re 8 Complaint (epri) (Entered: 06/16/2015)
06/11/2015	11	PLAINTIFF'S MOTION for Preliminary Injunction by G. G. (epri) (Entered: 06/16/2015)

06/11/2015	12	PLAINTIFF'S MOTION for Leave to File Brief in excess of thirty pages by G. G. (epri) (Entered: 06/16/2015)
06/11/2015	13	Memorandum in Support of Plaintiff's Motion for Leave to File a Brief in Excess of Thirty Pages re 11 PLAINTIFF'S MOTION for Preliminary Injunction 12 PLAINTIFF'S MOTION for Leave to File Brief in excess of thirty pages filed by G. G. (Attachments: # 1 Proposed Memorandum of law in support of Plaintiff's Motion for Preliminary Injunction)(epri) (Entered: 06/16/2015)
06/16/2015	1	Sealed ORDER Signed by District Judge Robert G. Doumar on 6/15/2015. (epri) (Entered: 06/16/2015)
06/16/2015	14	One Summons, with service copy, Issued as to Gloucester County School Board. (Attachments: # 1 Civil Motions Procedures)(epri) (Entered: 06/16/2015)
06/17/2015	15	Motion to appear Pro Hac Vice by Joshua Abraham Block and Certification of Local Counsel Rebecca Kim Glenberg Filing fee \$ 75, receipt number 0422-4501488. by G. G.. (Glenberg, Rebecca) (Entered: 06/17/2015)

06/17/2015	16	Motion to appear Pro Hac Vice by Leslie Jill Cooper and Certification of Local Counsel Rebecca Kim Glenberg Filing fee \$ 75, receipt number 0422-4501506. by G. G.. (Glenberg, Rebecca) (Entered: 06/17/2015)
06/17/2015	17	ORDER granting 12 Motion for Leave to File a brief in excess of thirty pages in support of the plaintiff's motion for a preliminary injunction.. Signed by Magistrate Judge Tommy E. Miller on 6/17/2015. (Miller, Tommy) (Entered: 06/17/2015)
06/18/2015	18	Memorandum in Support re 11 MOTION for Preliminary Injunction filed by G. G.. (Deady, Gail) (Entered: 06/18/2015)
06/18/2015	19	Request for Hearing by G. G. re 11 MOTION for Preliminary Injunction (Deady, Gail) (Entered: 06/18/2015)
06/23/2015	20	ORDER granting 15 Motion for Pro hac vice for Joshua Abraham Block as to G. G.. Signed by District Judge Robert G. Doumar on 6/23/15. (tlev,) (Entered: 06/24/2015)

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06/23/2015	21	ORDER granting 16 Motion for Pro hac vice for Leslie Jill Cooper as to G. G.. Signed by District Judge Robert G. Doumar on 6/23/15. (tlev,) (Entered: 06/24/2015)
06/29/2015	22	AFFIDAVIT of Service by G. G. (bgra,). (Entered: 06/29/2015)
06/29/2015	23	NOTICE of Appearance by David P. Corrigan on behalf of Gloucester County School Board (Corrigan, David) (Entered: 06/29/2015)
06/29/2015	24	NOTICE of Appearance by Jeremy David Capps on behalf of Gloucester County School Board (Capps, Jeremy) (Entered: 06/29/2015)
06/29/2015	25	NOTICE of Appearance by Maurice Scott Fisher, Jr on behalf of Gloucester County School Board (Fisher, Maurice) (Entered: 06/29/2015)
06/29/2015	26	MOTION for Extension of Time to File Response/Reply <i>to Motion for Preliminary Injunction</i> by Gloucester County School Board. (Fisher, Maurice) (Entered: 06/29/2015)

06/29/2015	27	RESPONSE to Motion re 26 MOTION for Extension of Time to File Response/Reply to <i>Motion for Preliminary Injunction</i> filed by G. G.. (Glenberg, Rebecca) (Entered: 06/29/2015)
06/29/2015	28	Statement of Interest of The United States by The United States. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(bgra) (Entered: 06/29/2015)
06/30/2015		Motion Hearing as to 11 MOTION for Preliminary Injunction set for 7/20/2015 at 02:30 PM in Norfolk Mag Courtroom 1 before District Judge Robert G. Doumar. (lbax,) (Entered: 06/30/2015)
06/30/2015		MOTIONS REFERRED to Magistrate Judge: Tommy E. Miller. 26 MOTION for Extension of Time to File Response/Reply to <i>Motion for Preliminary Injunction</i> (bgra) (Entered: 06/30/2015)
06/30/2015	29	ORDER granting 26 Motion for Extension of Time to File Response/Reply re 11 MOTION for Preliminary Injunction. Response due July 7, 2015.Signed by Magistrate Judge Tommy E. Miller on 6/30/2015. (bgra) (Entered: 06/30/2015)

JA 7

07/07/2015	30	Opposition to 11 MOTION for Preliminary Injunction filed by Gloucester County School Board. (Attachments: # 1 Exhibit Exhibit A -, # 2 Exhibit Exhibit B, # 3 Exhibit Exhibit C)(Corrigan, David) (Entered: 07/07/2015)
07/07/2015	31	MOTION to Dismiss for Failure to State a Claim by Gloucester County School Board. (Corrigan, David) (Entered: 07/07/2015)
07/07/2015	32	Brief in Support to 31 MOTION to Dismiss for Failure to State a Claim filed by Gloucester County School Board. (Attachments: # 1 Exhibit Exhibit 1)(Corrigan, David) (Entered: 07/07/2015)
07/07/2015	33	CERTIFICATE of Service re 30 Opposition by David P. Corrigan on behalf of Gloucester County School Board (Corrigan, David) (Entered: 07/07/2015)
07/07/2015	34	CERTIFICATE of Service re 31 MOTION to Dismiss for Failure to State a Claim by David P. Corrigan on behalf of Gloucester County School Board (Corrigan, David) (Entered: 07/07/2015)

JA 8

07/07/2015	35	CERTIFICATE of Service re 32 Brief in Support by David P. Corrigan on behalf of Gloucester County School Board (Corrigan, David) (Entered: 07/07/2015)
07/08/2015	36	MOTION for Hearing re 31 MOTION to Dismiss for Failure to State a Claim by Gloucester County School Board. (Corrigan, David) Mo (Entered: 07/08/2015)
07/08/2015	37	Brief in Support to 36 MOTION for Hearing (Corrigan, David) Modified docket text on 7/8/2015 (ccol); Modified docket text to correct linkage to motion on 7/10/2015 (bgra). (Entered: 07/08/2015)
07/08/2015	38	RESPONSE in Opposition re 36 MOTION for Hearing re 31 MOTION to Dismiss for Failure to State a Claim filed by G. G.. (Glenberg, Rebecca) (Entered: 07/08/2015)
07/10/2015	39	Motion to appear Pro Hac Vice by Victoria Lill and Certification of Local Counsel Clare P. Wuerker by The United States. (Attachments: # 1 Exhibit Pro Hac Vice Application)(Wuerker, Clare) (Entered: 07/10/2015)

07/10/2015	40	Reply to Motion re 36 MOTION for Hearing re 31 MOTION to Dismiss for Failure to State a Claim filed by Gloucester County School Board. (Corrigan, David) (Entered: 07/10/2015)
07/13/2015	41	REPLY to Response to Motion re 11 MOTION for Preliminary Injunction filed by G. G.. (Attachments: # 1 Exhibit A)(Deady, Gail) (Entered: 07/13/2015)
07/13/2015		Notice of Correction: The filing user has been notified to file a separate Certificate of Service. re 41 Reply to Response to Motion (bgra) (Entered: 07/16/2015)
07/16/2015	42	ORDER granting 39 Motion for Pro hac vice for Victoria Lill as to The United States. Signed by District Judge Robert G. Doumar on 7/15/15. (tlev,) (Entered: 07/16/2015)
07/16/2015	43	CERTIFICATE of Service re 41 Reply, Reply to Response to Motion by Gail Marie Deady on behalf of G. G. (Deady, Gail) (Entered: 07/16/2015)

07/16/2015	44	RESPONSE in Opposition re 31 MOTION to Dismiss for Failure to State a Claim filed by G. G. (Attachments: # 1 Exhibit A - Tudor Opinion, # 2 Exhibit B - Tudor Intervenor Complaint)(Glenberg, Rebecca) (Entered: 07/16/2015)
07/17/2015	45	ORDER: This Court will hear the fully briefed Motion to Dismiss before it will consider any other motions. The hearing set on July 20, 2015, is hereby VACATED, and no motions will be heard at that time. Instead, all motions then pending and responded to will be heard on July 27, 2015 at 11:00 a.m. in this Court. Copies distributed to all counsel of record. re 36 Motion for Hearing. Signed by District Judge Robert G. Doumar on 7/16/2015. (bgra) (Entered: 07/17/2015)
07/17/2015		Reset Hearing as to 31 MOTION to Dismiss for Failure to State a Claim , and Motions :. Motion Hearing reset for 7/27/2015 at 11:00 AM in Norfolk Grand Jury Courtroom before District Judge Robert G. Doumar. (ptom,) (Entered: 07/17/2015)

JA 11

07/17/2015		Reset Hearing as to 31 MOTION to Dismiss for Failure to State a Claim , and Motions. Motion Hearing set for 7/27/2015 at 11:00 AM in Norfolk Mag Courtroom 1 before District Judge Robert G. Doumar. (Courtroom change from Grand Jury Room to Mag Courtroom 1) (ptom,) (Entered: 07/17/2015)
07/22/2015	46	Reply to Motion re 31 MOTION to Dismiss for Failure to State a Claim, REPLY to Response to Motion, Reply filed by Gloucester County School Board. (Corrigan, David) (Entered: 07/22/2015)

07/27/2015	47	<p>Motion Hearing before District Judge Robert G. Doumar held on 7/27/2015 re 11 MOTION for Preliminary Injunction filed by G.G., 31 MOTION to Dismiss for Failure to State a Claim filed by Gloucester County School Board. Appearances: Rebecca K. Glenberg, Gail Deady, Leslie J. Cooper and Joshua A. Block appeared for the Plaintiff. David P. Corrigan and Jeremy D. Capps appeared for the Defendant. Clare P. Wuerker and Victoria Lill appeared on behalf of the Interested Party, The United States. Arguments of counsel. Comments of Court. The Court DISMISSED the Title IX claim but takes the remainder of the motions under advisement. The Court will issue a written opinion as to its findings. The Defendants will have 21 days from the filing of the Court's opinion to file an answer. The case will be referred for scheduling at that time. Court adjourned. (Court Reporter Heidi Jeffreys, OCR.)(lbax,) (Entered: 07/28/2015)</p>
07/30/2015	49	<p>Transcript Redaction Request re 48 Transcript,,, by attorney Rebecca Kim Glenberg. (Glenberg, Rebecca) (Entered: 07/30/2015)</p>

JA 13

07/31/2015	50	Redacted Version of 48 Transcript (afar) (Entered: 07/31/2015)
07/31/2015	51	ORDER: The Court ORDERS that G.G.'s identifying information, as shown on page fifteen (15) of the transcript of the June 27, 2015 hearing, lines fourteen (14), fifteen (15), sixteen (16), and eighteen (18), shall be under seal. The Court further ORDERS that this identifying information shall not be released by the Clerk or any party or individual without a specific order of the Court. Copy of Order provided to all counsel of record. Signed by District Judge Robert G. Doumar on 7/31/2015. (bgra) (Entered: 07/31/2015)
09/03/2015		Case Reassigned to Magistrate Judge Douglas E. Miller. Magistrate Judge Tommy E. Miller no longer assigned to the case. (afar) (Entered: 09/03/2015)
09/04/2015	53	ORDER - DENIES 11 Plaintiff's Motion for Preliminary Injunction. Signed by District Judge Robert G. Doumar on 9/4/15. (afar) (Entered: 09/04/2015)

JA 14

09/08/2015	54	NOTICE OF APPEAL as to 53 Order on Motion for Preliminary Injunction by G. G.. Filing fee \$ 505, receipt number 0422-4626161. (Glenberg, Rebecca) (Entered: 09/08/2015)
09/09/2015	55	Transmission of Notice of Appeal to US Court of Appeals re 54 Notice of Appeal (All case opening forms, plus the transcript guidelines, may be obtained from the Fourth Circuit's website at www.ca4.uscourts.gov) (Attachments: # 1 Notice of Appeal)(bgra) (Entered: 09/09/2015)
09/10/2015	56	USCA Case Number 15-2056 4CCA Case Manager Jennifer Rice for 54 Notice of Appeal filed by G. G. (15-2056 (bgra) (Entered: 09/10/2015)
09/17/2015	57	MEMORANDUM OPINION - the Court GRANTED the Motion to Dismiss as to Count II, Plaintiff's claim under Title IX, and DENIED the Plaintiff's Motion for Preliminary Injunction. Signed by District Judge Robert G. Doumar on 9/17/15. (afar) (Entered: 09/17/2015)
09/22/2015	58	Consent MOTION for Leave to File <i>Corrected Copies of Redacted Documents</i> by G. G.. (Attachments: # 1 Corrected Decl. of G.G., # 2 Corrected Decl. of Dr. Ettner) (Deady, Gail) (Entered: 09/22/2015)

JA 15

09/23/2015		MOTIONS REFERRED to Magistrate Judge: Douglas E. Miller. 58 Consent MOTION for Leave to File <i>Corrected Copies of Redacted Documents</i> (bgra) (Entered: 09/24/2015)
10/01/2015	59	ORDER granting 58 Motion for Leave to File Corrected Copies of Redacted Exhibits. The corrected copies attached to the Motion (ECF Nos. 58-1 and 58-2) may be filed as substitutes for the redacted Declarations of G.G. and Dr. Randi Ettner originally filed in support of the Motion for Preliminary Injunction (ECF Nos. 9 and 10). Signed by Magistrate Judge Douglas E. Miller on October 1, 2015. (Miller, Douglas) (Entered: 10/01/2015)
10/05/2015	60	Declaration re 9 Declaration - <i>Corrected</i> by G. G.. (Deady, Gail) (Entered: 10/05/2015)
10/05/2015	61	Declaration re 10 Declaration - <i>Corrected</i> by G. G.. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Deady, Gail) (Entered: 10/05/2015)

JA 16

04/19/2016	62	Published Opinion of USCA (Copy): Reversed in part, Vacated in part, and Remanded. re 54 Notice of Appeal attached copy of judgment will not take effect until issuance of the mandate. (15-2056) (bgra) (Entered: 04/19/2016)
04/19/2016	63	USCA JUDGMENT as to 54 Notice of Appeal filed by G. G.: In accordance with the decision of this court, the judgment of the district court is reversed in part and vacated in part. This case is remanded to the district court for further proceedings consistent with the court's decision. This judgment shall take effect upon issuance of this court's mandate in accordance with Fed. R. App. P. 41. (15-2056) (bgra) (Entered: 04/19/2016)

05/03/2016	64	STAY OF MANDATE: Under Fed. R. App. P. 41(d)(1), the timely filing of a petition for rehearing or rehearing en banc or the timely filing of a motion to stay the mandate stays the mandate until the court has ruled on the petition for rehearing or rehearing en banc or motion to stay. In accordance with Rule 41(d)(1), the mandate is stayed pending further order of this court. as to 54 Notice of Appeal filed by G.G. (cchr) (Entered: 05/03/2016)
05/31/2016	65	PUBLISHED ORDER of USCA : denying Motion for rehearing en banc 54 Notice of Appeal filed by G. G. (15-2056) (bgra) (Entered: 06/01/2016)
06/07/2016	66	STAY OF MANDATE re 54 Notice of Appeal : Under Fed. R. App. P. 41(d)(1), the timely filing of a petition for rehearing or rehearing en banc or the timely filing of a motion to stay the mandate stays the mandate until the court has ruled on the petition for rehearing or rehearing en banc or motion to stay. In accordance with Rule 41(d)(1), the mandate is stayed pending further order of this court. (15-2056) (bgra) (Entered: 06/08/2016)

JA 18

06/09/2016	67	ORDER of USCA as to 54 Notice of Appeal filed by G. G. Upon consideration of the motion to stay mandate pending filing of petition for writ of certiorari, the court denies the motion. Judge Floyd and Senior Judge Davis voted to deny the motion. Judge Niemeyer voted to grant the motion. (15-2056) (bgra) (Entered: 06/09/2016)
06/17/2016	68	USCA Mandate re 54 Notice of Appeal. The judgment of this court, entered 4/19/2016, takes effect today. This constitutes the formal mandate of this court issued pursuant to Rule 41(a) of the Federal Rules of Appellate Procedure. (15-2056) (bgra) (Entered: 06/17/2016)
06/23/2016		Rule 16(b) Scheduling Conference set for 6/29/2016 at 10:00 AM in Norfolk Grand Jury Courtroom before District Judge Robert G. Doumar. (lbax,) (Entered: 06/23/2016)

06/23/2016	69	ORDER: Based on the evidence submitted through declarations previously proffered for the purpose of the hearing on the Preliminary Injunction, this Court, pursuant to Title IX, hereby ORDERS that Gloucester County School Board permit the plaintiff, G.G., to use the boys' restroom at Gloucester High School until further order of this Court. Copy of Order delivered to all counsel of record. Signed by District Judge Robert G. Doumar on 6/23/2016. (bgra) (Entered: 06/23/2016)
06/27/2016	70	NOTICE OF APPEAL as to 69 Order, by Gloucester County School Board. Filing fee \$ 505, receipt number 0422-5050850. (Corrigan, David) (Entered: 06/27/2016)
06/28/2016		Transmission of Notice of Appeal to US Court of Appeals re 70 Notice of Appeal (All case opening forms, plus the transcript guidelines, may be obtained from the Fourth Circuit's website at www.ca4.uscourts.gov) (bgra) (Entered: 06/28/2016)
06/28/2016	71	MOTION to Stay re 69 Order, <i>Pending Appeal</i> by Gloucester County School Board. (Corrigan, David) (Entered: 06/28/2016)

06/28/2016	72	Memorandum in Support re 71 MOTION to Stay re 69 Order, <i>Pending Appeal</i> filed by Gloucester County School Board. (Corrigan, David) (Entered: 06/28/2016)
06/29/2016		Scheduling Conference - Rule 16b held on 6/29/2016 before District Judge Robert G. Doumar: Rebecca Glenberg and Joshua block present on behalf of the plaintiff; David Corrigan and Jeremy Capps present on behalf of the defendant; Comments of Court and Counsel; Court directed counsel to file a response to motion by 7/1/16. Trial date selected; Discovery schedule reviewed. Order to follow. Court adjourned. (Court Reporter Heidi Jeffreys.)(lhow,) (Entered: 06/30/2016)
06/30/2016	73	Rule 16(b) Scheduling Order - Pursuant to the Rule 16(b) Conference it is ordered that the Final Pretrial Conference set for 1/19/2017 at 10:00 AM in Norfolk. Bench Trial set for 1/31/2017 at 10:00 AM in Newport News. Signed by District Judge Robert G. Doumar & filed on 6/30/16. (ptom,) (Entered: 06/30/2016)

JA 21

06/30/2016	74	USCA Case Number 16-1733 4CCA - Case Manager Jennifer Rice for 70 Notice of Appeal filed by Gloucester County School Board. [16-1733] (cchr) (Entered: 06/30/2016)
07/01/2016	75	RESPONSE to Motion re 71 MOTION to Stay re 69 Order, <i>Pending Appeal</i> filed by G. G.. (Glenberg, Rebecca) (Entered: 07/01/2016)

07/06/2016	76	<p>ORDER denying 71 Motion to Stay. This Court is bound by the Judgment of the Court of Appeals. The Court of Appeals' actions in denying a rehearing en banc and a stay of its mandate indicate that it desires that its Judgment take effect immediately. The Court of Appeals itself is bound by its own prior precedents. Although Defendant has filed an appeal of the Preliminary Injunction, the Court of Appeals' prior opinion in this case will control in that appeal. This Court believes that based on the law as laid out in that opinion and the evidence submitted by declarations in this case, the Preliminary Injunction was warranted. There are no grounds for a stay. Accordingly, the Court DENIES the Motion for Stay Pending Appeal. ECF No. 71. Signed by District Judge Robert G. Doumar on 7/6/2016. (bgra) (Entered: 07/06/2016)</p>
07/06/2016	77	<p>ANSWER to 8 Complaint by Gloucester County School Board.(Corrigan, David) (Entered: 07/06/2016)</p>

JA 23

07/07/2016		Jury Trial set for 1/31/2017 at 10:00 AM in Newport News Courtroom 1 before District Judge Robert G. Doumar. (lbax,) (Entered: 07/07/2016)
07/12/2016	78	ORDER of USCA as to 70 : Upon consideration of submissions relative to the motion of appellant for stay pending appeal, the court denies the motion. Entered at the direction of Judge Floyd. Senior Judge Davis wrote an opinion concurring in the denial of a stay pending the filing of, and action on, a petition for certiorari. Judge Niemeyer wrote an opinion dissenting from the denial of a stay pending appeal. Notice of Appeal filed by Gloucester County School Board (16-1733) (bgra) (Entered: 07/14/2016)

08/03/2016	79	<p>SUPREME COURT REMARK: The application to recall and stay the mandate of the United States Court of Appeals for the Fourth Circuit in case No. 152056, presented to THE CHIEF JUSTICE and by him referred to the Court, is granted and the preliminary injunction entered by the United States District Court for the Eastern District of Virginia on June 23, 2016, is hereby stayed pending the timely filing and disposition of a petition for a writ of certiorari. Should the petition for a writ of certiorari be denied, this stay shall terminate automatically. In the event the petition for a writ of certiorari is granted, the stay shall terminate upon the issuance of the judgment of this Court.</p> <p>(15-2056)(bgra) (Entered: 08/04/2016)</p>
08/18/2016	80	<p>MOTION to Stay by Gloucester County School Board. (Corrigan, David) (Entered: 08/18/2016)</p>
08/18/2016	81	<p>Brief in Support to 80 MOTION to Stay filed by Gloucester County School Board. (Corrigan, David) (Entered: 08/18/2016)</p>

JA 25

08/19/2016	82	ORDER of USCA as to 70 Notice of Appeal filed by Gloucester County School Board : Upon consideration of the joint motion to hold appeal in abeyance pending disposition of certiorari petition, the court grants the motion. (16-1733) (bgra) (Entered: 08/19/2016)
08/23/2016	83	Joint MOTION for Protective Order by G. G.. (Deady, Gail) (Entered: 08/23/2016)
08/23/2016	84	Memorandum in Support re 83 Joint MOTION for Protective Order filed by G. G.. (Attachments: # 1 Proposed Order Protective Order)(Deady, Gail) (Entered: 08/23/2016)
08/23/2016		MOTIONS REFERRED to Magistrate Judge: Douglas E. Miller. 83 Joint MOTION for Protective Order (bgra) (Entered: 08/23/2016)
08/24/2016	85	AGREED CONFIDENTIALITY PROTECTIVE ORDER: granting 83 Joint MOTION for Protective Order by G. G. Signed by Magistrate Judge Douglas E. Miller on 8/24/2016. (bgra) (Entered: 08/24/2016)

08/31/2016	86	ORDER granting 80 Motion to Stay. The Court hereby GRANTS the Motion to Stay and STAYS this matter pending the disposition of the School Board's petition for a writ of certiorari with the United States Supreme Court.
		ECF No. 80. Copy of Order provided to all Counsel of Record. Signed by District Judge Robert G. Doumar on 8/31/2016. (bgra) (Entered: 08/31/2016)
09/02/2016	87	SUPREME COURT REMARK: The petition for a writ of certiorari in the above entitled case was filed on August 29, 2016 and placed on the docket September 1, 2016 as No. 16-273. re 54 Notice of Appeal. [15-2056] (ldab,) (Entered: 09/02/2016)
10/31/2016	88	Supreme Court Remark re 54 Notice of Appeal : The petition for a writ of certiorari is granted limited to Questions 2 and 3 presented by the petition. (bgra) (Entered: 11/02/2016)

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

15-2056

G. G. v. Gloucester County School Board

- 09/10/2015 1 Case docketed. Originating case number: 4:15-cv-00054-RGD-DEM. Case manager: JRice. [15-2056] (JR)
- 09/10/2015 2 DOCKETING NOTICE issued Re: [1] case docketed Initial forms due within 14 days. Originating case number: 4:15-cv-00054-RGD-DEM. Mailed to: Leslie Cooper, Gail Marie Deady, Victoria Lill, Clare Patricia Wuerker. [15-2056] (JR)
- 09/10/2015 3 APPEARANCE OF COUNSEL (Local Rule 46(c)) by Joshua Block for G. G.. [999657665] [15-2056] Joshua Block
- 09/10/2015 4 DOCKETING STATEMENT by Appellant G. G.. [15-2056] Joshua Block
- 09/10/2015 5 DISCLOSURE OF CORPORATE AFFILIATIONS (Local Rule 26.1) by Appellant G. G.. Was any question on Disclosure Form answered yes? No [999657889] [15-2056] Joshua Block

- 09/11/2015 6 BRIEFING ORDER filed. Mailed to: Clare Patricia Wuerker, Victoria Lill, Gail Marie Deady. Opening Brief and Appendix due 10/21/2015. Response Brief due 11/23/2015 [15-2056] (JR)
- 09/11/2015 7 Initial mediation conference scheduled. [15-2056] (LP)
- 09/18/2015 8 DISTRICT COURT UPDATE. MEMORANDUM OPINION - the Court GRANTED the Motion to Dismiss as to Count II, Plaintiff's claim under Title IX, and DENIED the Plaintiff's Motion for Preliminary Injunction. Signed by District Judge Robert G. Doumar on 9/17/15. [15-2056] (JB)
- 09/18/2015 9 APPEARANCE OF COUNSEL (Local Rule 46(c)) by David P. Corrigan for Gloucester County School Board.[999662899] [15-2056] David Corrigan
- 09/18/2015 10 APPEARANCE OF COUNSEL (Local Rule 46(c)) by Jeremy D. Capps for Gloucester County School Board.[999662921] [15-2056] Jeremy Capps

- 09/18/2015 11 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by M. Scott Fisher,
Jr. for Gloucester County School
Board.[999662937] [15-2056]
Maurice Fisher
- 09/18/2015 12 DISCLOSURE OF CORPORATE
AFFILIATIONS (Local Rule 26.1) by
Appellee Gloucester County School
Board. Was any question on
Disclosure Form answered yes? No
[999662942] [15-2056] David
Corrigan
- 09/22/2015 13 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Gail M. Deady
for G. G..[999665175] [15-2056] Gail
Deady

- 10/21/2015 14 FULL ELECTRONIC APPENDIX and full paper appendix by Appellant G. G.. Method of Filing Paper Copies: hand delivery. Date paper copies mailed dispatched or delivered to court: 10/21/2015. Has district court 90-day restriction expired for all transcripts included in appendix? No. The electronic appendix is initially restricted to case participants only. Case participants must be logged into CM/ECF to view the appendix prior to public release. Appendices in Immigration and Social Security cases will remain restricted.[999683001] [15-2056] Rebecca Glenberg
- 10/21/2015 15 (ENTRY RESTRICTED) BRIEF by Appellant G. G. in electronic and paper format. Type of Brief: OPENING. Method of Filing Paper Copies: hand delivery. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 10/21/2015. [999683006] [15-2056]--[Edited 01/06/2016 by JR] Rebecca Glenberg
- 10/21/2015 16 OPENING BRIEF (PAPER) file-stamped, on behalf of G. G.. Number of pages: [75]. Sufficient: YES. Number of Copies: [1]. Entered on Docket Date: 10/21/2015. [999683159] [15-2056] (JR)

- 10/21/2015 17 APPENDIX (PAPER) file-stamped, on behalf of G. G.. Total number of volumes (including any sealed): 1. Total number of pages in all volumes: 167. Total number of sealed volumes: 0. Sufficient? Yes. CD/DVD/Other exhibit? No. Number of Copies: [1]. Entered on Docket Date: 10/21/2015. [999683214] [15-2056] (JR)
- 10/28/2015 18 NOTICE re: Change of address of appellant's attorney Rebecca Glenberg by G. G.. [15-2056] Rebecca Glenberg
- 10/28/2015 19 MOTION by Suzanne B. Goldberg, counsel for Amici National Women's Law Center, et al leave to file. Date and method of service: 10/28/2015 ecf. [999688303] [15-2056] Suzanne Goldberg
- 10/28/2015 20 AMICUS CURIAE/INTERVENOR BRIEF by Suzanne B. Goldberg, counsel for Amici National Women's Law Center, et al in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 10/29/2015. [999688320] [15-2056] Suzanne Goldberg

- 10/28/2015 21 MOTION by Amici Curiae Judy Chiasson, et al. to file amicus curiae brief (FRAP 29(e)) without consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 10/28/2015 ecf. [999688359] [15-2056] Cynthia Robertson
- 10/28/2015 22 AMICUS CURIAE/INTERVENOR BRIEF by Amici Curiae Judy Chiasson, et al. in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 10/29/2015. [999688362] [15-2056] Cynthia Robertson
- 10/28/2015 23 MOTION by AMICI CURIAE: World Professional Association for Transgender Health; Pediatric Endocrine Society; et al. to file amicus curiae brief (FRAP 29(e)) without consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 10/28/2015 ecf. [999688367] [15-2056] Thomas Hefferon

- 10/28/2015 24 AMICUS CURIAE/INTERVENOR BRIEF by AMICI CURIAE: World Professional Association for Transgender Health; Pediatric Endocrine Society; et al. in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 10/28/2015. [999688368] [15-2056] Thomas Hefferon
- 10/28/2015 25 AMICUS CURIAE/INTERVENOR BRIEF by Christine Monta, counsel for United States - Amicus Curiae in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 10/28/2015. [999688374] [15-2056] Christine Monta
- 10/28/2015 26 MOTION by Gender Benders et al., Amici Curiae to file amicus curiae brief (FRAP 29(e)) without consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 10/28/2015 ecf. [999688378] [15-2056] David Dinielli

- 10/29/2015 27 Corrected AMICUS CURIAE/INTERVENOR BRIEF by Gender Benders et al. in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 10/29/2015. [999688646] [15-2056] David Dinielli
- 10/29/2015 28 ORDER filed [999689019] granting Motion to file amicus curiae brief [26], granting Motion to file amicus curiae brief [23], granting Motion to file amicus curiae brief [21], granting Motion to file amicus curiae brief [19]. Disclosure Statement filed (if corporate amicus)? Y. Appearance Form filed? Y. Copies to all parties. Mailed to: Victoria Lill and Clare Patricia Wuerker. [15-2056] (JR)

- 10/29/2015 29 Docket correction requested from Mr. Thomas Michael Hefferon for GLMA: Health Professionals Advancing LGBT Equality, The World Professional Association for Transgender Health, Pediatric Endocrine Society, Child and Adolescent Gender Center Clinic at UCSF Benioff Children's Hospital, Center for Transyouth Health and Development at Children's Hospital Los Angeles, Gender & Sex Development Program at Ann & Robert H. Lurie Children's Hospital of Chicago, Fan Free Clinic, Whitman-Walker Clinic, Inc. and Transgender Law & Policy Institute. Mailed to: Victoria Lill and Clare Patricia Wuerker. [15-2056] (JR)
- 10/30/2015 Appendix [14] released to public. [15-2056] (JR)
- 10/30/2015 30 AMICUS CURIAE BRIEF (PAPER) file-stamped, on behalf of Thomas A Aberli, Robert Bourgeois, Diana K. Bruce, Judy Chiasson, Mary Doran, Sherie Hohns, Lisa Love, Jeremy Majeski, John O'Reilly, Denise Palazzo, Dylan Pauly, Rudy Rudolph and David Vannasdall. Number of pages: [37]. Number of Copies: [1]. Entered on Docket Date: 10/30/2015.[999689474] [15-2056] (JR)

- 10/30/2015 31 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Rebecca K.
Glenberg for G. G..[999689490]
[15-2056] Rebecca Glenberg
- 10/30/2015 32 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Leslie Cooper
for G. G..[999689674] [15-2056]
Leslie Cooper
- 11/02/2015 33 AMICUS CURIAE BRIEF (PAPER)
file-stamped, on behalf of California
Women's Law Center, Equal Rights
Advocates, Gender Justice, Legal Aid
Society - Employment Law Center,
Legal Momentum, Legal Voice,
Southwest Women's Law Center,
The Association of Title IV
Administrators, NWLC and The
Women's Law Project. Number of
pages: [25]. Number of Copies: [1].
Entered on Docket Date:
11/02/2015.[999690399] [15-2056]
(JR)

- 11/02/2015 34 Corrected AMICUS CURIAE/INTERVENOR BRIEF by Amici Supporting Appellant Center for Transyouth Health and Development at Children's Hospital Los Angeles, Child and Adolescent Gender Center Clinic at UCSF Benioff Children's Hospital, Fan Free Clinic, GLMA: Health Professionals Advancing LGBT Equality, Gender & Sex Development Program at Ann & Robert H. Lurie Children's Hospital of Chicago, Pediatric Endocrine Society, The World Professional Association for Transgender Health, Transgender Law & Policy Institute and Whitman-Walker Clinic, Inc. Norman Spack, MD and Michelle Forcier, MD in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 11/02/2015. [999690813] [15-2056] Thomas Hefferon
- 11/03/2015 35 MOTION by Appellant G. G. for EXPEDITED ORAL ARGUMENT. Date and method of service: 11/03/2015 ecf. [999692228] [15-2056] Gail Deady

- 11/03/2015 38 AMICUS CURIAE BRIEF (PAPER)
file-stamped, on behalf of Center for
Transyouth Health and
Development at Children's Hospital
Los Angeles, Child and Adolescent
Gender Center Clinic at UCSF
Benioff Children's Hospital, Fan
Free Clinic, GLMA: Health
Professionals Advancing LGBT
Equality, Gender & Sex
Development Program at Ann &
Robert H. Lurie Children's Hospital
of Chicago, Pediatric Endocrine
Society, The World Professional
Association for Transgender Health,
Transgender Law & Policy Institute
and Whitman-Walker Clinic, Inc.
Norman Spack and Michelle Forcier.
Number of pages: [63]. Number of
Copies: [1]. Entered on Docket Date:
11/04/2015.[999692579] [15-2056]
(JR)
- 11/03/2015 39 AMICUS CURIAE BRIEF (PAPER)
file-stamped, on behalf of US.
Number of pages: [41]. Number of
Copies: [8]. Entered on Docket Date:
11/04/2015.[999692588] [15-2056]
(JR)

- 11/04/2015 37 ORDER filed [999692493] [35], granting motion for expedited oral argument and tentatively calendaring case. Argument Date or Session: January 26-28, 2016. Copies to all parties. Mailed to: Victoria Lill and Clare Patricia Wuerker. [15-2056] (JR)
- 11/04/2015 40 CASE TENTATIVELY CALENDARED for oral argument during the 1/26/16 - 1/28/16 argument session. Notify Clerk's Office of any scheduling conflict by: 11/09/2015 [15-2056] (JLC)
- 11/05/2015 41 AMICUS CURIAE BRIEF (PAPER) file-stamped, on behalf of Gay, Lesbian & Straight Education Network, Gay-Straight Alliance Network, Gender Benders, Evie Priestman, ROSMY, Time Out Youth, We Are Family and iNSIDEoUT. Number of pages: [42]. Number of Copies: [1]. Entered on Docket Date: 11/05/2015.[999694024] [15-2056] (JR)

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- 11/05/2015 42 Additional copies (3) received from Thomas A Aberli, Robert Bourgeois, Diana K. Bruce, Judy Chiasson, Mary Doran, Sherie Hohns, Lisa Love, Jeremy Majeski, John O'Reilly, Denise Palazzo, Dylan Pauly, Rudy Rudolph and David Vannasdall. Select type of brief: AMICUS BRIEF. [15-2056] (JR)
- 11/17/2015 43 COPY FOLLOW-UP NOTICE issued to Gender Benders, Gender Justice, The World Professional Association for Transgender Health and G. G. requesting additional copies of brief(s). Additional copies due 11/23/2015 [15-2056] (AC)
- 11/17/2015 44 Additional copies of OPENING BRIEF and Joint Appendix received from G. G. [15-2056] (AD)
- 11/18/2015 45 Additional copies of AMICUS BRIEF received from The World Professional Association for Transgender Health, et al. [15-2056] (AC)
- 11/23/2015 46 Additional copies of AMICUS BRIEF received from Gender Benders. [15-2056] (AC)

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- 11/23/2015 47 BRIEF by Appellee Gloucester County School Board in electronic and paper format. Type of Brief: RESPONSE. Method of Filing Paper Copies: hand delivery. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 11/23/2015. [999705264] [15-2056] David Corrigan
- 11/23/2015 48 RESPONSE BRIEF (PAPER) file-stamped, on behalf of Gloucester County School Board. Number of pages: [61]. Sufficient: YES. Number of Copies: [4]. Entered on Docket Date: 11/24/2015. [999706246] [15-2056] (JR)
- 11/24/2015 49 CASE CALENDARED for oral argument. Date: 01/27/2016. Registration Time: 8:45 - 9:00. Daily Arguments Begin: 9:30. Oral argument acknowledgment form due within 5 days. [15-2056] (JLC)
- 11/24/2015 50 ORAL ARGUMENT ACKNOWLEDGMENT by Appellee Gloucester County School Board. [999706659] [15-2056] David Corrigan

- 11/24/2015 51 ORAL ARGUMENT
ACKNOWLEDGMENT by Appellant
G. G.. Counsel arguing: Joshua A.
Block [999706733] [15-2056] Joshua
Block
- 11/25/2015 52 Additional copies of AMICUS BRIEF
received from National Women's
Law Center, et al. [15-2056] (AC)
- 11/30/2015 53 AMICUS CURIAE/INTERVENOR
BRIEF by State of South Carolina,
amicus curiae in electronic and
paper format. Type of Brief: Amicus
Curiae. Method of Filing Paper
Copies: courier. Date Paper Copies
Mailed, Dispatched, or Delivered to
Court: 12/01/2015. [999708335]
[15-2056] James Smith
- 11/30/2015 54 MOTION by Liberty Center for
Child Protection & Dr. Judith
Reisman, Amici Curiae Supporting
Appellee to file amicus curiae brief
(FRAP 29(e)) without consent of all
parties on appeal within time
allowed by FRAP 29(e).. Date and
method of service: 11/30/2015 ecf.
[999708346] [15-2056] Mary
McAlister

- 11/30/2015 55 AMICUS CURIAE/INTERVENOR BRIEF by Liberty Center for Child Protection & Dr. Judith Reisman, Amici Supporting Appellee in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: courier. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 11/30/2015. [999708351] [15-2056] Mary McAlister
- 11/30/2015 56 ORDER filed [999708768] granting filing of amicus curiae brief (FRAP 29(e)). Disclosure Statement filed (if corporate amicus)? Y. Appearance Form filed? Y. Copies to all parties. Mailed to: Victoria Lill, Clare Patricia Wuerker. [15-2056] (JR)
- 11/30/2015 57 MOTION by Family Foundation of Virginia, et al., amicus curiae to file amicus curiae brief (FRAP 29(e)) without consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 11/30/2015 ecf. [999708890] [15-2056] John Sharp

- 11/30/2015 58 AMICUS CURIAE/INTERVENOR BRIEF by Family Foundation of Virginia, et al., amicus curiae in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: mail. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 12/01/2015. [999708898] [15-2056] John Sharp
- 11/30/2015 59 MOTION by Lawrence J. Joseph, counsel for movant-amicus Eagle Forum Education & Legal Defense Fund to file amicus curiae brief (FRAP 29(e)) without consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 11/30/2015 US mail, ecf. [999708984] [15-2056] Lawrence Joseph
- 11/30/2015 60 AMICUS CURIAE/INTERVENOR BRIEF by Lawrence J. Joseph, counsel for amicus Eagle Forum Education & Legal Defense Fund in electronic and paper format. Type of Brief: Amicus Curiae. Method of Filing Paper Copies: courier. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 12/01/2015. [999708985] [15-2056] Lawrence Joseph

- 11/30/2015 62 AMICUS CURIAE BRIEF (PAPER)
file-stamped, on behalf of Eagle
Forum Education and Legal Defense
Fund. Number of pages: [43].
Number of Copies: [4]. Entered on
Docket Date: 12/02/2015.[999710236]
[15-2056] (JR)
- 11/30/2015 63 AMICUS CURIAE BRIEF (PAPER)
file-stamped, on behalf of Rodney
Autry, Tim Byrd, Donald Caulder,
Wendy Caulder, Claudia Clifton,
Joshua Cuba, Mark Frechette,
Bradly Friedlin, Ilona Gambill,
Doretha Guju, James Larsen, Jon
Lynsky, Alice May, Issac Rutan, Jim
Rutan, Lee Terry, Lisa Terry, The
Family Foundation of Virginia,
David Thornton, Kathy Thornton,
John Walsh, Lorraine Walsh and
Kim Ward. Number of pages: [43].
Number of Copies: [8]. Entered on
Docket Date: 12/02/2015.[999710399]
[15-2056] (JR)
- 11/30/2015 64 AMICUS CURIAE BRIEF (PAPER)
file-stamped, on behalf of Liberty
Center for Child Protection and
Judith Reisman. Number of pages:
[44]. Number of Copies: [4]. Entered
on Docket Date:
12/02/2015.[999710496] [15-2056]
(JR)

- 11/30/2015 65 AMICUS CURIAE BRIEF (PAPER) file-stamped, on behalf of Paul R. LePage, Patrick L. McCrory, State of Arizona, State of Mississippi, State of South Carolina and State of West Virginia. Number of pages: [33]. Number of Copies: [1]. Entered on Docket Date: 12/02/2015.[999710582] [15-2056] (JR)
- 12/01/2015 61 ORDER filed [999709340] granting Motion to file amicus curiae brief [57], granting Motion to file amicus curiae brief [59]. Disclosure Statement filed (if corporate amicus)? Y. Appearance Form filed? Y. Copies to all parties. Mailed to: Victoria Lill, Clare Patricia Wuerker. [15-2056] (JR)
- 12/02/2015 66 COPY FOLLOW-UP NOTICE issued to Paul R. LePage, Patrick L. McCrory, State of Arizona, State of Mississippi, State of South Carolina and State of West Virginia requesting 3 additional copies of brief. Additional copies due 12/07/2015 [15-2056] (JR)
- 12/04/2015 67 Additional copies of AMICUS BRIEF received from Paul R. LePage, Patrick L. McCrory, State of Arizona, State of Mississippi, State of South Carolina and State of West Virginia. [15-2056] (JR)

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- 12/07/2015 68 BRIEF by Appellant G. G. in electronic and paper format. Type of Brief: REPLY. Method of Filing Paper Copies: hand delivery. Date Paper Copies Mailed, Dispatched, or Delivered to Court: 12/07/2015. [999713437] [15-2056] Gail Deady
- 12/07/2015 69 REPLY BRIEF (PAPER) file-stamped, on behalf of G. G.. Number of pages: [39]. Sufficient: YES. Number of Copies: [4]. Entered on Docket Date: 12/07/2015. [999713876] [15-2056] (JR)
- 01/06/2016 70 Errata sheet for paper briefs by G. G.. Identify brief: OPENING. Corrected electronic brief must be filed separately by counsel. [15-2056] Joshua Block
- 01/06/2016 71 Corrected BRIEF by Appellant G. G. in electronic and paper format. Type of Brief: OPENING. Method of Filing Paper Copies: N/A. [999731266] [15-2056] Joshua Block

- 01/27/2016 72 ORAL ARGUMENT heard before the Honorable Paul V. Niemeyer, Henry F. Floyd and Andre M. Davis. Attorneys arguing case: Mr. Joshua A. Block for Appellant G. G. and Mr. David Patrick Corrigan for Appellee Gloucester County School Board. Courtroom Deputy: Cathy Eagles. [999742790] [15-2056] (CWE)
- 03/19/2016 73 SUPPLEMENTAL AUTHORITIES (FRAP 28(j)) by Appellant G. G.. [999777925]. [15-2056] Joshua Block
- 04/19/2016 74 PUBLISHED AUTHORED OPINION filed. Originating case number: 4:15-cv-00054-RGD-DEM. [999798388]. [15-2056] (JR)
- 04/19/2016 75 JUDGMENT ORDER filed. Disposition method: 15-2056 opn.p.arg. Decision: Reversed in part, vacated in part, and remanded. Originating case number: 4:15-cv-00054-RGD-DEM. Entered on Docket Date: 04/19/2016. [999798406] Copies to all parties and the district court. [15-2056] (JR)
- 05/03/2016 76 PETITION for rehearing en banc (FRAP 35) by Appellee Gloucester County School Board. [15-2056] David Corrigan

- 05/03/2016 77 Mandate stayed by FRAP 41(d)(1). Mailed to: Clare Patricia Wuerker, Victoria Lill. [15-2056] (JR)
- 05/04/2016 78 Court order filed requesting response to Mr. Joshua A. Block, Leslie Cooper, Gail Marie Deady, and Rebecca Glenberg requesting response to Motion for rehearing en banc. [15-2056] (JR)
- 05/10/2016 79 (ENTRY RESTRICTED) AMICUS BRIEF on Petition for Rehearing (with appearance of counsel) by 50 Gloucester Students, Parents, and Grandparents, et al.. Supporting: appellee. [999819092] [15-2056]--[Edited 05/11/2016 by JR] John Sharp
- 05/10/2016 80 AMICUS BRIEF on Petition for Rehearing (with appearance of counsel) by Amici Supporting Appellee Paul R. LePage, Patrick L. McCrory, State of Arizona and State of West VirginiaStates of Kansas, Nebraska, Texas, and Utah. Supporting: appellee. [999819218] [15-2056] Elbert Lin

- 05/10/2016 81 MOTION by Public Advocate of the US, US Justice Foundation, and Conservative Legal Defense and Education Fund, amici curiae to file amicus curiae brief (FRAP 29(e)) with consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 05/10/2016 ecf. [999819233] [15-2056] William Olson
- 05/10/2016 82 AMICUS BRIEF on Petition for Rehearing (with appearance of counsel) by Public Advocate of the US, US Justice Foundation, and Conservative Legal Defense and Education Fund, amici curiae. Supporting: appellee. [999819234] [15-2056] William Olson
- 05/10/2016 83 MOTION by Amicus Supporting Appellee Eagle Forum Education and Legal Defense Fund to file amicus curiae brief (FRAP 29(e)) with consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 05/10/2016 ecf, US mail. [999819241] [15-2056] Lawrence Joseph

- 05/10/2016 84 AMICUS BRIEF on Petition for Rehearing (with appearance of counsel) by Amicus Supporting Appellee Eagle Forum Education and Legal Defense Fund. Supporting: appellee. [999819242] [15-2056] Lawrence Joseph
- 05/11/2016 85 MOTION by 50 Gloucester Students, Parents and Grandparents, et al. to file amicus curiae brief (FRAP 29(e)) with consent of all parties on appeal within time allowed by FRAP 29(e).. Date and method of service: 05/11/2016 ecf. [999819997] [15-2056] John Sharp
- 05/11/2016 86 Corrected AMICUS BRIEF on Petition for Rehearing (with appearance of counsel) by 50 Gloucester Students, Parents and Grandparents, et al.. Supporting: appellee. [999820001] [15-2056] John Sharp

- 05/11/2016 87 MOTION by Amici Supporting Appellee Paul R. LePage, Patrick L. McCrory, State of Arizona and State of West Virginia States of Kansas, Nebraska, Texas, and Utah to file amicus curiae brief (FRAP 29(e)) as government agency or officer within time allowed by FRAP 29(e).. Date and method of service: 05/11/2016 Courier delivery, ecf. [999820189] [15-2056] Elbert Lin
- 05/16/2016 88 SUPPLEMENTAL AUTHORITIES (FRAP 28(j)) by Appellee Gloucester County School Board. [999823451]. [15-2056] David Corrigan
- 05/16/2016 89 RESPONSE/ANSWER to rehearing by G. G.. [15-2056] Joshua Block
- 05/31/2016 90 COURT ORDER filed [999838355] denying Motion for rehearing en banc [76]. Copies to all parties. Mailed to: Victoria Lill, Paul LePage & Clare Wuerker. [15-2056] (TW)
- 06/07/2016 91 MOTION by Appellee Gloucester County School Board to stay mandate [FRAP 41(d)]. Date and method of service: 06/07/2016 ecf. [999845549] [15-2056] David Corrigan

- 06/07/2016 92 Mandate stayed by FRAP 41(d)(1) pending ruling on motion to stay the mandate. Mailed to: Victoria Lill, Paul LePage & Clare Wuerker. [15-2056] (JR)
- 06/07/2016 93 COURT ORDER filed [999846184] granting Motion to file amicus curiae brief [87], granting Motion to file amicus curiae brief [85], granting Motion to file amicus curiae brief [83], granting Motion to file amicus curiae brief [81]. Disclosure Statement filed (if corporate amicus)? Y. Appearance Form filed? Y. Copies to all parties. Mailed to: Victoria Lill, Paul LePage & Clare Wuerker. [15-2056] (JR)
- 06/09/2016 94 COURT ORDER filed [999849259] denying Motion to stay mandate [FRAP 41(d)] [91]. Copies to all parties. Mailed to: Victoria Lill, Paul LePage & Clare Wuerker. [15-2056] (TW)
- 06/17/2016 95 [MANDATE RECALLED, 08/03/2016, see DE 97] Mandate issued. Referencing: [74] Published Authored Opinion, [75] Judgment Order. Originating case number: 4:15-cv-00054-RGD-DEM. Mailed to: Victoria Lill, Paul LePage & Clare Wuerker. [15-2056] (JR)

- 08/03/2016 97 SUPREME COURT
REMARK--Order of the Supreme Court granting the application to recall and stay this court's mandate and staying the preliminary injunction entered by the district court pending the timely filing and disposition of a petition for writ of certiorari. [15-2056] (PSC)
- 09/02/2016 98 (ENTRY RESTRICTED) SUPREME COURT REMARK -- petition for writ of certiorari filed 08/29/2016. 16-273 [15-2056]--[Edited 11/01/2016 by SAC] (SJC)
- 09/02/2016 99 SUPREME COURT
REMARK--petition for writ of certiorari filed. 08/29/2016. 16-273. [15-2056, 16-1733] (SAC)
- 11/01/2016 100 SUPREME COURT
REMARK--petition for writ of certiorari granted. 10/31/2016 [15-2056, 16-1733] (SJC)

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

16-1733

G. G. v. Gloucester County School Board

- 06/30/2016 1 Case docketed. Originating case number: 4:15-cv-00054-RGD-DEM. Case manager: JRice. [16-1733] (JR)
- 06/30/2016 3 DOCKETING NOTICE issued Re: [1] case docketed Initial forms due within 14 days. Originating case number: 4:15-cv-00054-RGD-DEM. Mailed to: Clare Patricia Wuerker, Victoria Lill. [16-1733] (JR)
- 07/04/2016 4 APPEARANCE OF COUNSEL (Local Rule 46(c)) by Stuart Kyle Duncan for Gloucester County School Board.[999877628] [16-1733] Stuart Duncan
- 07/06/2016 5 Emergency MOTION by Appellant Gloucester County School Board for stay pending appeal.. Date and method of service: 07/06/2016 ecf. [999879862] [16-1733] Stuart Duncan

- 07/06/2016 6 DISTRICT COURT UPDATE.
ORDER denying [71] Motion to Stay.
This Court is bound by the
Judgment of the Court of Appeals.
The Court of Appeals' actions in
denying a rehearing en banc and a
stay of its mandate indicate that it
desires that its Judgment take effect
immediately. The Court of Appeals
itself is bound by its own prior
precedents. Although Defendant has
filed an appeal of the Preliminary
Injunction, the Court of Appeals'
prior opinion in this case will control
in that appeal. This Court believes
that based on the law as laid out in
that opinion and the evidence
submitted by declarations in this
case, the Preliminary Injunction was
warranted. There are no grounds for
a stay. Accordingly, the Court
DENIES the Motion for Stay
Pending Appeal. ECF No. 71. Signed
by District Judge Robert G. Doumar
on 7/6/2016. [16-1733] (AD)
- 07/06/2016 7 NOTICE ISSUED to Mr. Joshua A.
Block, Leslie Cooper, Gail Marie
Deady and Rebecca Glenberg for G.
G. requesting response to Motion for
stay pending appeal [5] Response
due: 07/07/2016 by 2:00
PM.[999880066]. [16-1733] (JR)

- 07/07/2016 8 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Gail M. Deady
for G. G..[999881592] [16-1733] Gail
Deady
- 07/07/2016 9 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Gail Deady for
G. G..[999881595] [16-1733] Gail
Deady
- 07/07/2016 10 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Gail Deady for
G. G..[999881597] [16-1733] Gail
Deady
- 07/07/2016 11 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Rebecca K.
Glenberg for G. G..[999881601]
[16-1733] Gail Deady
- 07/07/2016 12 RESPONSE/ANSWER by G. G. to
notice requesting response [7],
Motion for stay pending appeal [5].
Nature of response: in opposition.
[16-1733] Gail Deady
- 07/12/2016 13 COURT ORDER filed [999886440]
denying Motion for stay pending
appeal [5] Copies to all parties.
[16-1733] (PSC)
- 07/14/2016 14 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by David P.
Corrigan for Gloucester County
School Board.[999888523] [16-1733]
David Corrigan

- 07/14/2016 15 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Jeremy D.
Capps for Gloucester County School
Board.[999888531] [16-1733] Jeremy
Capps
- 07/14/2016 16 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by M. Scott Fisher,
Jr. for Gloucester County School
Board.[999888535] [16-1733]
Maurice Fisher
- 07/14/2016 17 DISCLOSURE OF CORPORATE
AFFILIATIONS (Local Rule 26.1) by
Appellant Gloucester County School
Board. Was any question on
Disclosure Form answered yes? No
[999888541] [16-1733] David
Corrigan
- 07/14/2016 18 DOCKETING STATEMENT by
Appellant Gloucester County School
Board. [16-1733] David Corrigan
- 07/14/2016 19 BRIEFING ORDER filed. Mailed to:
Victoria Lill & Clare Wuerker.
Opening Brief and Appendix due
08/23/2016. Response Brief due
09/26/2016. [16-1733] (TW)
- 07/15/2016 20 APPEARANCE OF COUNSEL
(Local Rule 46(c)) by Gene C.
Schaerr for Gloucester County
School Board.[999889083] [16-1733]
Gene Schaerr

- 07/27/2016 21 DOCKETING FORMS FOLLOW-UP NOTICE ISSUED to Mr. Joshua A. Block, Leslie Cooper, Gail Marie Deady and Rebecca Glenberg for Appellee G. G. re: filing of disclosure form (Loc.R. 26.1) Disclosure statement due from G. G. on 08/01/2016. [16-1733] (JR)
- 07/27/2016 22 DISCLOSURE OF CORPORATE AFFILIATIONS (Local Rule 26.1) by Appellee G. G.. Was any question on Disclosure Form answered yes? No [999898440] [16-1733] Gail Deady
- 08/03/2016 23 SUPREME COURT REMARK--Supreme Court order granting motion to recall and stay this court's mandate in No. 15-2056 and staying the preliminary injunction entered by the district court on June 23, 2016, pending the filing and disposition of a petition for writ of certiorari. [16-1733] (PSC)
- 08/16/2016 24 MOTION by Appellant Gloucester County School Board and Appellee G. G. to place case in abeyance.. Date and method of service: 08/16/2016 ecf. [999911838] [16-1733] David Corrigan

JA 60

- 08/19/2016 25 COURT ORDER filed [999913689] granting Motion for abeyance (Local Rule 12(d)) [24]. Case 16-1733 placed in abeyance pending decision in 16A52 from U. S. Supreme Court. Copies to all parties. [16-1733] (JR)
- 08/31/2016 26 DISTRICT COURT UPDATE. ORDER granting [80] Motion to Stay. The Court hereby GRANTS the Motion to Stay and STAYS this matter pending the disposition of the School Board's petition for a writ of certiorari with the United States Supreme Court. ECF No. 80. Copy of Order provided to all Counsel of Record. Signed by District Judge Robert G. Doumar on 8/31/2016. [16-1733] (AD)
- 09/02/2016 27 SUPREME COURT REMARK--petition for writ of certiorari filed. 08/29/2016. 16-273. [15-2056, 16-1733] (SAC)
- 11/01/2016 28 SUPREME COURT REMARK--petition for writ of certiorari granted. 10/31/2016 [15-2056, 16-1733] (SJC)

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division

Civil No. 4:15cv54

[Filed June 11, 2015]

G.G., by his next friend and mother,)
DEIRDRE GRIMM,)
)
Plaintiffs,)
)
v.)
)
GLOUCESTER COUNTY SCHOOL)
BOARD,)
)
Defendant.)

COMPLAINT

INTRODUCTION

1. G.G. is a 16-year-old boy who recently completed his sophomore year at Gloucester High School. He is a boy who is transgender, which means that he was designated female at birth but he has a male gender identity. He has been diagnosed by medical professionals as having Gender Dysphoria, which is a serious medical condition characterized by clinically significant distress caused by an incongruence between a person's gender identity and the person's assigned sex at birth.

2. Since the end of his freshman year, G.G. has undergone treatment for Gender Dysphoria, in accordance with the widely recognized standards of care for that condition. A critical element of that treatment is a “social transition” in which G.G. lives in accordance with his gender identity as a boy in all aspects of his life. As part of that process, G.G. has legally changed his name to “G.G.” (a traditionally male name).

3. Shortly before his sophomore year, G.G. and his mother informed school officials that G.G. is a transgender boy. School officials immediately expressed support for G.G. and took steps to ensure that he would be treated as a boy by teachers and staff. Later in the school year, at G.G.’s request, and consistent with recognized standards of care for transgender students, school officials allowed him to use the boys’ restroom. He did so without incident for approximately seven weeks.

4. On December 9, 2014, the Gloucester County School Board, responding to pressure from some parents – and other Gloucester County residents without school-age children – enacted a policy that overruled the decision of school administrators and categorically barred transgender students from using restrooms that correspond with their gender identity. The policy declared that access to the boys’ and girls’ restrooms would be limited to students of “the corresponding biological genders,” and also declared that students who are unable to use such restrooms because of “gender identity issues” would be relegated to “an alternative appropriate private facility.”

5. As a result of the School Board's transgender restroom policy, G.G. is currently the only student in his school who must use separate private restrooms. The distinction stigmatizes G.G. and marks him as different from the other students; it isolates G.G. from his peers; and it exposes him to serious psychological harm. To avoid the stigma of having to use separate restrooms, G.G. has tried to avoid using *any* restroom during the school day.

6. The School Board's transgender restroom policy discriminates against G.G. on the basis of gender and sex in violation of the Equal Protection Clause of the Fourteenth Amendment and Title IX of the Education Amendments of 1972. G.G. seeks redress from this Court.

JURISDICTION AND VENUE

7. This action arises under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, *et seq.*, the Constitution of the United States, and 42 U.S.C. § 1983. This Court has jurisdiction pursuant to Article III of the United States Constitution and 28 U.S.C. § 1331. Declaratory relief is authorized by 28 U.S.C. §§ 2201 and 2202.

8. Venue lies with this Court pursuant to 28 U.S.C. §§ 1391(b)(1)-(2), because the defendant resides in this District and a substantial part of the events or omissions giving rise to the claim occurred in this District.

PARTIES

9. Plaintiff G.G. is sixteen years old and is a student at Gloucester High School (“GHS”), a public high school in Gloucester County.

10. Deirdre Grimm is G.G.’s mother and sues as his next friend.

11. The Gloucester County School Board (the “School Board”) is an elected body responsible for the operation of the Gloucester County Public Schools (“GCPS”), including the promulgation of policies. At all times relevant, the School Board has acted and continues to act under color of state law.

FACTUAL ALLEGATIONS

12. G.G. was born in Gloucester County on May 4, 1999, and has lived in Gloucester County his entire life. G.G. is a typical teenager who is articulate and intelligent, reads broadly, loves his dog and cats, and enjoys hanging out with his friends.

13. Photographs of G.G. taken over the past year are attached as Exhibit A.

14. G.G. is also a transgender boy. That is, his assigned sex at birth was female, but that designation does not conform to his male gender identity. G.G. has been diagnosed with Gender Dysphoria, the medical diagnosis for individuals whose gender identity – their innate sense of being male or female – differs from the sex they were assigned at birth, which causes distress.

15. Gender Dysphoria is a serious medical condition that if left untreated can lead to clinical

distress, debilitating depression, and even suicidal thoughts and acts.

16. At a very young age, G.G. was aware that he did not feel like a girl.

17. G.G. has always felt uncomfortable wearing “girl” clothes, and by the age of six, he adamantly refused to do so. He soon insisted upon buying all of his clothes in the boys’ department.

18. At approximately age twelve, G.G. acknowledged his male gender identity to himself. He gradually began disclosing this fact to close friends. Since the reactions of his friends were generally positive and supportive, he disclosed his gender identity to more friends.

19. In approximately ninth grade, most of G.G.’s friends were aware of his gender identity, and G.G. presented himself as a boy when he socialized with them away from home and school.

20. During his freshman year, G.G. experienced severe depression and anxiety related to his untreated Gender Dysphoria and the stress of concealing his gender identity from his family. For this reason, he did not attend school during the spring semester of his freshman year. Instead, he took classes through a home-bound program that follows the public high school curriculum.

21. In April 2014, G.G. told his parents that he is transgender. At his request, he began to see a psychologist who had experience with working with transgender patients. The psychologist diagnosed him with Gender Dysphoria.

22. Mental health and medical professionals worldwide recognize and follow the evidence-based standards of care for the treatment of Gender Dysphoria developed by the World Professional Association for Transgender Health (WPATH). After diagnosing G.G. with Gender Dysphoria, his psychologist developed a course of treatment consistent with those standards. The goal of treatment is to alleviate distress by helping a person live congruently with the person's gender identity.

23. A critical component of the WPATH Standards of Care is a social transition to living full-time consistently with the individual's gender identity. Accordingly, G.G.'s psychologist recommended that he immediately begin living in accordance with his gender identity as a boy in all respects. That included using a male name and pronouns and using boys' restrooms. G.G.'s psychologist also provided him a "Treatment Documentation Letter" confirming that he was receiving treatment for Gender Dysphoria and that, as part of that treatment, he should be treated as a boy in all respects, including with respect to his use of the restroom.

24. For transgender adolescents, it is critical that the social transition involve full transition at school, including with respect to restrooms. Excluding a transgender boy from the restroom that corresponds to the student's gender identity, or forcing the student to use a separate facility from other boys, communicates to the entire school community that he should not be recognized as a boy and undermines the social transition process.

25. Based on his psychologist's recommendation, in July 2014, G.G. petitioned the Circuit Court of Gloucester County to change his legal name to G.G., and the court granted the petition. G.G. now uses that name for all purposes, and at his request, his friends and family refer to him using male pronouns. G.G. also uses the boys' restrooms when out in public, e.g., at restaurants, libraries, shopping centers.

26. Also consistent with the WPATH standards of care, G.G.'s psychologist recommended that he see an endocrinologist to begin hormone treatment. G.G. has been receiving hormone treatment since December 2014. Among other therapeutic benefits, the hormone treatment has deepened G.G.'s voice, increased his growth of facial hair, and given him a more masculine appearance.

27. In August 2014, G.G. and his mother informed officials at Gloucester High School that G.G. is transgender and that he changed his name. The high school changed G.G.'s name in his official school records.

28. Before the beginning of the 2014-15 school year, G.G. and his mother met with Gloucester High School Principal T. Nathan Collins and guidance counselor Tiffany Durr to discuss G.G.'s treatment for Gender Dysphoria and the need for him to socially transition at school as part of his medical treatment. Mr. Collins and Ms. Durr both expressed support for G.G. and a willingness to ensure a welcoming environment for him at school. Ms. Durr and G.G. agreed that G.G. would send an email to teachers explaining that he was to be addressed using the name G.G. and to be referred to using male pronouns. To the

best of G.G.'s knowledge, no teachers, administrators, or staff at Gloucester High School expressed any resistance to these instructions.

29. G.G. requested, and was permitted, to continue with the home-bound program only for his physical education requirement, while returning to school for the rest of his classes. For this reason, he has not and does not intend to use a locker room at school.

30. G.G. initially agreed to use a separate restroom in the nurse's office because he was unsure how other students would react to his transition.

31. When the 2014-15 school year began, G.G. was pleased to discover that his teachers and the vast majority of his peers respected the fact that he is a boy and treated him accordingly. G.G. quickly determined that it was not necessary for his safety to continue to use the nurse's bathroom, and he found it stigmatizing to have to use a separate restroom. The nurse's bathroom was also very inconvenient to G.G.'s classrooms, making it difficult to use the restroom between classes. For these reasons, G.G. asked Mr. Collins to be allowed to use the boys' bathrooms.

32. On or about October 20, 2014, Mr. Collins agreed that G.G. could use the boys' restrooms. For approximately the next seven weeks, G.G. used the boys' restrooms without incident.

33. Nevertheless, some adults in the community were angered when they came to learn that a transgender student had been allowed to use the restroom corresponding to the student's gender identity. Upon information and belief, those adults contacted members of the School Board to demand that

the transgender student be barred from continuing to use the restroom at issue.

34. Shortly before the School Board's meeting on November 11, 2014, Board member Carla B. Hook added an item to the agenda titled "Discussion of Use of Restrooms/Locker Room Facilities." In advance of the meeting, Ms. Hook prepared to submit the following proposed resolution (hereinafter referred to as the "transgender restroom policy"):

Whereas the GCPS recognizes that some students question their gender identities, and

Whereas the GCPS encourages such students to seek support, advice, and guidance from parents, professionals and other trusted adults, and

Whereas the GCPS seeks to provide a safe learning environment for all students and to protect the privacy of all students, therefore

It shall be the practice of the GCPS to provide male and female restroom and locker room facilities in its schools, and the use of said facilities shall be limited to the corresponding biological genders, and students with gender identity issues shall be provided an alternative appropriate private facility.

35. Through emails and online message boards, news circulated among certain Gloucester County residents that they should attend the School Board meeting on November 11, 2014, and speak in favor of Ms. Hook's proposed restroom policy.

36. Neither G.G. nor his parents were informed by the School Board or any other school officials that the School Board would be considering a policy that would bar G.G. from using the boy's restroom. G.G. and his parents learned about the proposal for the first time on November 10 – the day before the School Board meeting was scheduled to take place – when they saw one of the messages posted by supporters of Ms. Hook's proposed restroom policy.

37. Twenty-seven people spoke during the Citizens' Comment Period of the School Board meeting, the majority of whom opposed the school's decision to allow G.G. to use the boys' restrooms. The commenters displayed many misperceptions about transgender people and imagined dire consequences from allowing G.G. to use the boys' restrooms. Some speakers referred to G.G. as a "young lady." Some speakers claimed that transgender students' use of restrooms that match their gender identity would violate the privacy of other students and would lead to sexual assault in bathrooms. Another suggested that boys who are not transgender would come to school wearing a dress and demand to use the girls' restroom for nefarious purposes.

38. G.G. and his parents also attended the meeting to speak against the policy. In doing so, G.G. was forced to identify himself to the entire community, including local press covering the meeting, as the transgender student whose restroom use was at issue. "All I want to do is be a normal child and use the restroom in peace," G.G. said. "I did not ask to be this way, and it's one of the most difficult things anyone can

face,” he continued. “This could be your child . . . I’m just a human. I’m just a boy.”

39. Later in the meeting, Board member Carla B. Hook moved to adopt her proposed transgender restroom policy. By a vote of 4-3, the School Board voted to defer a vote on the policy until its meeting on December 9, 2014.

40. Between November 11, 2014, and December 9, 2014, the School Board was informed by many legal sources that the proposed restroom policy conflicted with guidance of the Department of Education’s Office of Civil Rights (OCR) regarding Title IX and that adopting the policy would place the district’s Title IX funding at risk. According to OCR guidance, transgender students are protected under Title IX from discrimination based on gender identity or gender nonconformity, and schools must respect students’ gender identity for purposes of any sex-segregated programming. *See* U.S. Department of Education Office for Civil Rights, Questions & Answers on Title IX and Single-Sex Elementary and Secondary Classes and Extracurricular Activities (Dec. 1, 2014); U.S. Department of Education Office for Civil Rights, Questions & Answers on Title IX and Sexual Violence (Apr. 29, 2014).

41. On December 3, 2014, the School Board issued a news release stating that regardless of the outcome of the upcoming meeting, the School Board intended to take measures to increase privacy in student bathrooms. According to the release:

One positive outcome of all the discussion is that the District is planning to increase the privacy

options for all students using school restrooms . . . Plans include adding or expanding partitions between urinals in male restrooms, and adding privacy strips to the doors of stalls in all restrooms. The District also plans to designate single-stall, unisex restrooms, similar to what's in many other public spaces, to give all students the option for even greater privacy.

42. At the School Board's December 9, 2014 meeting, approximately 37 people spoke during the Citizens' Comment Period. The majority of speakers opposed G.G.'s use of the boys' restrooms. Several speakers threatened to vote the School Board members out of office if they did not adopt the transgender restroom policy. Speakers again suggested that permitting G.G. to use the boys' bathroom would violate the privacy of other students, notwithstanding the School Board's announcement that bathrooms would be modified to allow more privacy. Some speakers said that allowing G.G. to use the boys' bathroom would make the bathrooms "coed." Speakers again referred to G.G. as a "girl" or "young lady." One speaker called him a "freak" and compared him to a person who thinks he is a "dog" and wants to urinate on fire hydrants.

43. Following the Citizens' Comment Period, the School Board voted 6-1 to pass the transgender restroom policy.

44. The experience of having the entire community discuss his physical anatomy and debate where he should use the restroom and has been profoundly disturbing for G.G.. He feels that he has

been stripped of his privacy and turned into a public spectacle.

45. The day after the School Board adopted the transgender restroom policy, Mr. Collins informed G.G. that he would no longer be allowed to use the boys' restrooms and that there would be disciplinary consequences if he tried to do so.

46. Using the girls' restroom is not possible for G.G. Even before he began treatment for Gender Dysphoria, girls and women who encountered G.G. in female restrooms reacted negatively because they perceived G.G. to be a boy. For example, when G.G. was in eighth and ninth grade, girls would tell him "this is the girls' room" and ask tell him to leave. G.G.'s appearance now is even more masculine. In addition to those practical obstacles, using the girls' restroom would cause severe psychological distress to G.G. and would be incompatible with his medically necessary treatment for Gender Dysphoria.

47. Since adopting the restroom policy, three unisex, single-stall restrooms have been installed at Gloucester High School. The school also raised the doors and walls around the bathroom stalls so that students cannot see into an adjoining stall. Additionally, the high school installed partitions between urinals in the boys' bathrooms. As a result, a person making normal use of the restroom cannot see the genitals of any other person.

48. G.G. refuses to use the separate single-stall restrooms they make him feel even more stigmatized and isolated than when he used the restroom in the nurse's office. Being required to use the separate

restrooms sets him apart from his peers, and serves as a daily reminder that the school views him as “different.” Other students do not appear to use the single-stall unisex restrooms. The entire school community knows that they were installed as restrooms for G.G., and any other transgender students, so they would not be in the same restroom as their peers.

49. Instead of using the separate restrooms, G.G. tries to avoid using the restrooms entirely while at school, and, if that is not possible, he uses the nurse’s restroom. As a result of trying to avoid using the restroom, G.G. has repeatedly developed painful urinary tract infections. He limits his beverage intake to try to reduce the discomfort and distraction caused by “holding it” as he tries to focus in class.

50. Because the powerful stigma attached to the requirement that he use separate restrooms, and because the exclusion from the boys’ restrooms undermines his social transition process, the transgender restroom policy inflicts severe and persistent emotional and social harms on G.G. Research indicates that transgender students are at greater risk than their peers of experiencing severe and long-term negative effects from being stigmatized by and isolated from their peers. The transgender restroom policy compounds that harm and imposes additional stigma on an already vulnerable group of students.

51. Randi Ettner Ph.D – a psychologist and nationally recognized expert in the treatment of Gender Dysphoria in children and adolescents – recently conducted an independent clinical assessment

of G.G. and concluded that “the shame of being singled out and stigmatized in his daily life every time he needs to use the restroom is a devastating blow to G.G. and places him at extreme risk for immediate and long-term psychological harm.”

52. By contrast, allowing G.G. to use the boys’ restroom would not harm any other student at Gloucester High School in any way. There is no indication that any student was harmed during the seven weeks that G.G. used the boys’ restrooms. The privacy modifications made to the restrooms address the already far-fetched concern that G.G. might see the genitals of another boy while using the restroom. Any boy who still feels uncomfortable with using the restroom at the same time as G.G. may avail himself of the recently installed single stall bathrooms. But the School Board may not place the burden solely on transgender students to use separate restroom facilities to address the alleged discomfort of others.

CLAIMS FOR RELIEF

COUNT I

Fourteenth Amendment to the United States Constitution

53. Under the Equal Protection Clause of the Fourteenth Amendment, discrimination based on gender is presumptively unconstitutional and subject to heightened scrutiny. The Fourteenth Amendment’s protections from discrimination based on gender encompass both discrimination based on the biological differences between men and women and discrimination based on gender nonconformity.

54. The School Board is the final policymaker for Gloucester County Public Schools.

55. By requiring G.G. – a transgender boy – to use separate restrooms because of his “gender identity issues,” the School Board, under color of state law, has treated and continues to treat G.G. differently from similarly situated students based on his gender.

56. By excluding G.G. – a transgender boy – from the boys’ restrooms because the School Board does not deem him to be “biologically” male, the School Board, under color of state law, has treated and continues to treat G.G. differently from similarly situated students based on his gender.

57. The School Board’s discrimination against G.G. based on his gender is not substantially related to any important government interest.

58. The School Board’s discrimination against G.G. based on his gender is not rationally related to any legitimate government interest.

59. The School Board’s discrimination against G.G. based on his gender denies him the equal protection of the laws, in violation of the Fourteenth Amendment to the United States Constitution.

60. The School Board is liable for its violation of G.G.’s Fourteenth Amendment rights under 42 U.S.C. § 1983.

COUNT II

**Title IX of the Education Amendments of 1972
20 U.S.C. § 1681 *et seq.***

61. Title IX provides that “[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” 20 U.S.C. § 1681(a).

62. Under Title IX, discrimination “on the basis of sex” encompasses both discrimination based on biological differences between men and women and discrimination based on gender nonconformity.

63. Gloucester County Public Schools and Gloucester High School are education programs receiving Federal financial assistance.

64. By requiring G.G. – a transgender boy – to use separate restrooms because of his “gender identity issues,” the School Board has and continues to exclude G.G. from participation in, deny him the benefits of, and subject him to discrimination in educational programs and activities at Gloucester County Public Schools and Gloucester High School “on the basis of sex,” which violates G.G.’s rights under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, *et seq.*

65. By excluding G.G. – a transgender boy – from the boys’ restrooms because the School Board does not deem him to be “biologically” male, the School Board has and continues to exclude G.G. from participation in, deny him the benefits of, and subject him to discrimination in educational programs and activities

at Gloucester County Public Schools and Gloucester High School “on the basis of sex,” which violates G.G.’s rights under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, *et seq.*

REQUEST FOR RELIEF

For the foregoing reasons, the plaintiffs respectfully request that the Court grant the following relief:

A. A declaration that the School Board’s transgender restroom policy violates G.G.’s rights under the Fourteenth Amendment to the United States Constitution and Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, *et seq.*;

B. Preliminary and permanent injunctions requiring the School Board to allow G.G. to use the boys’ restrooms at school;

C. Damages in an amount determined by the Court;

D. Plaintiffs’ reasonable costs and attorneys’ fees pursuant to 42 U.S.C. § 1988; and

E. Such other relief as the Court deems just and proper.

Dated: June 11, 2015

Respectfully submitted,

AMERICAN CIVIL LIBERTIES
UNION OF VIRGINIA
FOUNDATION, INC.

AMERICAN CIVIL
LIBERTIES UNION
FOUNDATION

_____/s/_____
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**Pro hac vice* motion to
follow

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division

Civil No. 4:15cv54

[Filed July 13, 2015]

G.G., by his next friend and mother,)
DEIRDRE GRIMM,)
)
Plaintiffs,)
)
v.)
)
GLOUCESTER COUNTY SCHOOL)
BOARD,)
)
Defendant.)

SUPPLEMENTAL DECLARATION OF G.G.

1. My name is G.G. I am the plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. On or about May 27, 2015, I went to a local branch of the Virginia Department of Motor Vehicles (DMV) to apply for a learner's permit and to complete Gender Change Designation Request in order to ensure that the permit would reflect my gender as male.

3. I subsequently received a letter from DMV dated June 5, 2015 stating: "The Department of Motor Vehicles (DMV) has approved your request to have the gender indicator on your credential changed from F to

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M.” A copy of the letter (with my name, address, and DMV Customer Number redacted) is attached to this Declaration as Exhibit A.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 10, 2015.

By: _____ s/
G.G.

JA 82

COMMONWEALTH of Virginia
Department of Motor Vehicles
2300 West Broad Street

Richard D. Holcomb Post Office Box 27412
Commissioner Richmond, VA 23269-0001

June 5, 2015

Dear

The Department of Motor Vehicles (DMV) has approved your request to have the gender indicator on your credential changed from F to M.

Please visit your local DMV to complete this transaction. Please present this letter to the Customer Service Representative (CSR) as it will help to expedite your request. You will then be issued a new credential with the new gender indicator.

Please retain this letter in the event you need to return to a Customer Service Center for a replacement or reissue credential:

If you or the CSR has any questions regarding the re-issuance of your credential or our gender change policy, you may contact us Monday-Friday from 8:15 a.m. until 5:00 p.m. at (804) 367-6203.

Sincerely,

/s _____
R. Smails
Medical Evaluator Senior
Medical Review Services

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division

Civil No. 4:15-cv-00054-RGD-DEM

[Filed October 5, 2015]

G.G., by his next friend and mother,)
DEIRDRE GRIMM,)
)
Plaintiffs,)
)
v.)
)
GLOUCESTER COUNTY SCHOOL)
BOARD,)
)
Defendant.)

CORRECTED EXPERT DECLARATION OF
RANDI ETTNER, Ph.D

PRELIMINARY STATEMENT

1. I have been retained by counsel for Plaintiff as an expert in connection with the above-captioned litigation. I have actual knowledge of the matters stated in this declaration.

2. My professional background, experience, and publications are detailed in my curriculum vitae, a true and accurate copy which is attached as Exhibit A to this report. I received my doctorate in psychology from Northwestern University in 1979. I am the chief

psychologist at the Chicago Gender Center, a position I have held since 2005.

3. I have expertise working with children and adolescents with Gender Dysphoria. During the course of my career, I have evaluated or treated between 2,500 and 3,000 individuals with Gender Dysphoria and mental health issues related to gender variance. Approximately 33% of those individuals were adolescents. I have also served as a consultant to the Wisconsin and Chicago public school systems on issues related to gender identity.

4. I have published three books, including the medical text entitled “Principles of Transgender Medicine and Surgery” (co-editors Monstrey & Eyler; Routledge, 2007). I have authored numerous articles in peer-reviewed journals regarding the provision of health care to this population. I have served as a member of the University of Chicago Gender Board, and am a member of the editorial board for the *International Journal of Transgenderism*.

5. I am a member of the Board of Directors of the World Professional Association for Transgender Health (WPATH) (formerly the Harry Benjamin International Gender Dysphoria Association), and an author of the WPATH *Standards of Care* (7th version), published in 2011. The WPATH-promulgated Standards of Care are the internationally recognized guidelines for the treatment of persons with Gender Dysphoria and serve to inform medical treatment in the United States and throughout the world.

6. In preparing this report, I reviewed the materials listed in the attached Bibliography (Exhibit

B). I may rely on those documents, in addition to the documents specifically cited as supportive examples in particular sections of this report, as additional support for my opinions. I have also relied on my years of experience in this field, as set out in my curriculum vitae (Exhibit A), and on the materials listed therein. The materials I have relied upon in preparing this report are the same types of materials that experts in my field of study regularly rely upon when forming opinions on the subject.

7. In addition to the materials in Exhibit B, I personally met with G.G. and Deirdre Grimm on May 26, 2015, to conduct a clinical assessment of G.G. The evaluation consisted of a clinical interview with, and observation of, G.G.; a subsequent interview with his mother; the administration of psychological testing; and a review of health records from his pediatrician and endocrinologist. I am confident that the opinions I hereafter render based on that assessment are both reliable and valid.

8. In the past four years, I have testified as an expert at trial or deposition in the following matters: *Kothmann v. Rosario*, Case No. 5:13-cv-28-Oc-22PRL (M.D. Fla.); *Doe et al v. Clenchy*, Case No cv-09-201 (Me. Super. Ct.)

9. I am being compensated at an hourly rate for actual time devoted, at the rate of \$245 per hour for any clinical services, review of records, or report; \$395 per hour for deposition and trial testimony; and \$900 per day for travel time spent out of the office. My compensation does not depend on the outcome of this litigation, the opinions I express, or the testimony I provide.

GENDER IDENTITY AND GENDER DYSPHORIA

10. The term “gender identity” is a well-established concept in medicine, referring to one’s sense of oneself as male or female. All human beings develop this elemental internal view: the conviction of belonging to one gender or the other. Gender identity is an innate and immutable aspect of personality that is firmly established by age four, although individuals vary in the age at which they come to understand and express, their gender identity.

11. Typically, people born with female anatomical features identify as girls or women, and experience themselves as female. Conversely, those persons born with male characteristics ordinarily identify as males. However, for transgender individuals, this is not the case. For transgender individuals, the sense of one’s self—one’s gender identity—differs from the natal, or birth-assigned sex, giving rise to a sense of being “wrongly embodied.”

12. The medical diagnosis for that feeling of incongruence is Gender Dysphoria, which is codified in the Diagnostic and Statistical manual of Mental Disorders (DSM-V) (American Psychiatric Association) and the International Classification of Diseases-10 (World Health Organization). The condition is manifested by symptoms such as preoccupation with ridding oneself of primary and secondary sex characteristics. Untreated Gender Dysphoria can result in significant clinical distress, debilitating depression, and often suicidality.

13. The criteria for establishing a diagnosis of Gender Dysphoria in adolescents and adults are set forth in the DSM-V (302.85):

- A. A marked incongruence between one's experienced/expressed gender and assigned gender, of at least 6 months duration, as manifested by at least two of the following:
 - 1. A marked incongruence between one's experienced/expressed gender and primary and/or secondary sex characteristics (or in young adolescents, the anticipated sex characteristics).
 - 2. A strong desire to be rid of one's primary/and or secondary sex characteristics because of a marked incongruence with one's experienced/expressed gender (or in young adolescents, a desire to prevent the development of the anticipated secondary sex characteristics).
 - 3. A strong desire for the primary and /or secondary sex characteristics of the other gender.
 - 4. A strong desire to be of the other gender (or some alternative gender different from one's assigned gender).
 - 5. A strong desire to be treated as the other gender (or some alternative gender different from one's assigned gender).
 - 6. A strong conviction that one has the typical feelings and reactions of the other gender (or

some alternative gender different from one's assigned gender).

- B. The condition is associated with clinically significant distress or impairment in social, occupational, or other important areas of functioning.

14. The World Professional Association for Transgender Health (WPATH) has established internationally accepted Standards of Care (SOC) for the treatment of people with Gender Dysphoria. The SOC have been endorsed as the authoritative standards of care by leading medical and mental health organizations, including the American Medical Association, the Endocrine Society, and the American Psychological Association.

15. In accordance with the SOC, individuals undergo medically-recommended transition in order to live in alignment with their gender identity. Treatment of the condition is multi-dimensional and varies from individual to individual depending on their needs, but can consist of social role transition, hormone therapy, and surgery to alter primary and/or secondary sex characteristics to help the individual live congruently with his or her gender identity and eliminate the clinically significant distress caused by Gender Dysphoria.

16. Social role transition is a critical component of the treatment for Gender Dysphoria. Social role transition is living one's life fully in accordance with one's gender identity. That typically includes, for a transgender male for example, dressing and grooming as a male, adopting a male name, and presenting

oneself to the community as a boy or man. Social transition is crucial to the individual's consolidation of his or her gender identity. The social transition takes place at home, at work or school, and in the broader community. It is important that the individual is able to transition in all aspects of his or her life. If any aspect of social role transition is impeded, however, it undermines the entirety of a person's transition.

17. In prior decades before Gender Dysphoria was well-studied and understood, some considered it to be a mental condition that should be treated by psychotherapy aimed at changing the patient's sense of gender identity to match assigned sex at birth. There is now a medical consensus that such treatment is not effective and can, in fact, can cause great harm to the patient.

**TREATMENT OF GENDER DYSPHORIA IN
ADOLESCENTS AND HARMFUL EFFECTS OF
EXCLUSIONS FROM SCHOOL RESTROOMS**

18. As with adults, treatment for Gender Dysphoria in adolescents frequently includes social transition and hormone therapy, but genital surgery is not permissible under the WPATH Standards of Care for persons who are under the legal age of majority. Hormone therapy has a profound virilizing effect on the appearance of a transgender boy. The voice deepens, there is growth of facial and body hair, body fat is redistributed, and muscle mass increases.

19. As with adults, for teenagers with Gender Dysphoria, social transition is a critical part of treatment. And as with adults, it is important that the social transition occur in all aspects of the individual's

life. For a gender dysphoric teen to be considered male in one situation, but not in another, is inconsistent with evidence-based medical practice and detrimental to the health and well-being of the child. The integration of a consolidated identity into the daily activities of life is the aim of treatment. Thus, it is critical that the social transition is complete and unqualified—including with respect to the use of restrooms.

20. Access to a restroom available to other boys is an undeniable necessity for transgender male adolescents. Restrooms, unlike other settings (e.g. the library), categorize people according to gender. There are two, and only two, such categories: male and female. To deny a transgender boy admission to such a facility, or to insist that one use a separate restroom, communicates that such a person is “not male” but some undifferentiated “other,” interferes with the person’s ability to consolidate identity, and undermines the social-transition process.

21. When transgender adolescents are not permitted to use restrooms that match their appearance and gender identity, the necessity of using the restroom can become a source of anxiety. The Chicago Gender Center physicians clinically report that youngsters often avoid drinking fluids during the day and hold their urine for the entire school day, making them prone to developing urinary tract infections, dehydration, and constipation. Anxiety regarding use of the restroom also makes it difficult for students to concentrate on learning and school activities.

22. Transgender adolescents like G.G. are particularly vulnerable during middle adolescence.

Middle adolescence, approximately 15-16 years, is the period of development when a teenager becomes extremely concerned with appearance and one's own body. This stage is accompanied by dramatic physical changes, including height and weight gains, growth of pubic and underarm hair, and breast development and menstruation in girls. Boys will experience growth of testicles and penis, a deepening of the voice and facial hair growth. There is an increased effort to make new friends, and an intense emphasis on the peer group. "Fitting in" is the overarching motivation at this stage of life.

23. While peers are developing along a "normal" and predictable trajectory, however, transgender teens like G.G. feel betrayed by the body, anxious about relationships, and frustrated by the challenges of a "non-normative" existence. At the very time of life when nothing is more important than being part of a peer group, fitting in, belonging, they may conspicuously stand out. Research shows that transgender students are at far greater risk for severe health consequences – including suicide – than the rest of the student population, and more than 50% of transgender youth will have had at least one suicide attempt by age 20.

24. If school administrators amplify this discomfort by sending a message that the student is different than his peers or shameful, they stigmatize nascent identity formation, which can be devastating for the student. Studies show that external attempts to negate a person's gender identity constitute *identity threat*. Developing and integrating a positive sense of self—identity formation—is a developmental task for

all adolescents. For the transgender adolescent, this is more complex, as the “self” violates society’s norms and expectations. Attempts to negate a person’s gender identity – such as excluding a transgender male adolescent from the restrooms used by other boys – challenge this blossoming sense of self and pose health risks, including depression, post-traumatic stress disorder, hypertension, and self-harm.

25. School administrators and other adults play a critical role in “setting the tone” for whether a student will be stigmatized and ostracized by peers. Excluding a transgender adolescent from the same restroom as his peers puts a “target on one’s back” for potential victimization and bullying. When adults—authority figures—deny an adolescent access to the restroom consistent with his lived gender, they shame him—negating the legitimacy of his identity and decimating confidence. In effect, they revoke membership from the peer group.

26. In a study of transgender youth age 15 to 21, investigators found school to be the most traumatic aspect of growing up. Experiences of rejection and discrimination from teachers and school personnel led to feelings of shame and unworthiness. The stigmatization they were routinely subjected to led many to experience academic difficulties and to drop out of school.

27. Until recently, it wasn’t fully understood that these experiences of shame and discrimination could have serious and enduring consequences. But it is now known that stigmatization and victimization are some of the most powerful predictors of current and future mental health problems, including the development of

psychiatric disorders. The social problems these transgender teens face at school actually create the blueprint for future mental health, life satisfaction, and even physical health. A recent study of 245 gender non-conforming adults found that stress and victimization at school was associated with a greater risk for posttraumatic stress disorder, depression, life dissatisfaction, anxiety, and suicidality in adulthood.

ASSESSMENT OF G.G.

28. It is my professional opinion that the Gloucester County School Board's policy of excluding G.G. from the communal restroom used by other boys and effectively banishing him to separate single-stall restroom facilities is currently causing emotional distress to an extremely vulnerable youth and placing G.G. at risk for accruing lifelong psychological harm.

29. As noted above, I personally met with G.G. on May 26, 2015, to conduct a clinical assessment. G.G. meets the criteria for Gender Dysphoria in adolescents and adults (302.85), in the Diagnostic and Statistical Manual of Mental Disorders, fifth edition (F64.1) in the International Classification of Diseases. Indeed, G.G. has a *severe* degree of Gender Dysphoria. By adolescence, children with G.G.'s severe degree of Gender Dysphoria are so dysphoric they cannot even attempt to live as female. Such individuals seek hormones and, when they are old enough, surgeries that can offer them the only real hope of a normal life. As an adolescent, medically necessary treatment for G.G. currently includes testosterone therapy and social transition in all aspects of his life – including with respect to use of the restrooms. Untreated, many of these youngsters commit suicide.

30. As a result of the School Board's restroom policy, however, G.G. is put in the humiliating position of having to use a separate facility, thereby accentuating his "otherness," undermining his identity formation, and impeding his medically necessary social transition process. The shame of being singled out and stigmatized in his daily life every time he needs to use the restroom is a devastating blow to G.G. and places him at extreme risk for immediate and long-term psychological harm.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 2, 2015.

By: [ORIGINAL SIGNATURE UNDER SEAL]

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Psychologist, Chicago Gender Center
Adjunct Faculty, Prescott College
Editorial Board, International Journal of
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Television and radio guest (more than 100 national and
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Internationally syndicated columnist
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EDUCATION

PhD, 1979 Northwestern University (with honors)
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- MA, 1976 Roosevelt University (with honors)
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Major: Clinical Psychology
- BA, 1969-72 Indiana University (cum laude)
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Major: psychology, Minor: sociology
- 1972 Moray College of Education
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International Education Program
- 1970 Harvard University
Cambridge, Massachusetts
Social relation undergraduate summer
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CLINICAL AND PROFESSIONAL EXPERIENCE

- Present Psychologist: Chicago Gender Center
Consultant: Walgreens;
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Private practitioner
- 2011 Instructor, Prescott College: Gender -
A multidimensional approach
- 2000 Instructor, Illinois Professional School
of Psychology
- 1995-present Supervision of clinicians in counseling
gender non-conforming clients
- 1993 Post-doctoral continuing education
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- 1992 Continuing advanced tutorial with Dr. Leah Schaefer in Psychotherapy
- 1983-1984 Staff psychologist, Women's Health Center, St. Francis Hospital, Evanston, Illinois
- 1981-1984 Instructor, Roosevelt University, Department of Psychology: Psychology of Women, Tests and Measurements, Clinical Psychology, Personal Growth, Personality Theories, Abnormal Psychology
- 1976-1978 Research Associate, Cook County Hospital, Chicago, Illinois Department of Psychiatry
- 1975-1977 Clinical Internship, Cook County Hospital, Chicago, Illinois Department of Psychiatry
- 1971 Research Associate, Department of Psychology, Indiana University
- 1970-1972 Teaching Assistant in Experimental and Introductory Psychology Department of Psychology, Indiana University
- 1969-1971 Experimental Psychology Laboratory Assistant, Department of Psychology, Indiana University

LECTURES AND HOSPITAL GRAND ROUNDS PRESENTATIONS

Gender reassignment surgery- Midwestern Association of Plastic Surgeons, 2015

Adult development and quality of life in transgender healthcare- Eunice Kennedy Shriver National Institute of Child Health and Human Development, 2015

Healthcare for transgender inmates- American Academy of Psychiatry and the Law, 2014

Supporting transgender students: best school practices for success- American Civil Liberties Union of Illinois and Illinois Safe School Alliance, 2014

Addressing the needs of transgender students on campus- Prescott College, 2014

The role of the behavioral psychologist in transgender healthcare – Gay and Lesbian Medical Association, 2013

Understanding transgender- Nielsen Corporation, Chicago, Illinois, 2013;

Role of the forensic psychologist in transgender care; Care of the aging transgender patient- University of California San Francisco, Center for Excellence, 2013

Evidence-based care of transgendered patients- North Shore University Health Systems, University of Chicago, Illinois, 2011; Roosevelt-St. Vincent Hospital, New York; Columbia Presbyterian Hospital, Columbia University, New York, 2011

Children of Transsexuals-International Association of Sex Researchers, Ottawa, Canada, 2005; Chicago School of Professional Psychology, 2005

Gender and the Law- DePaul University College of Law, Chicago, Illinois, 2003; American Bar Association annual meeting, New York, 2000

Gender Identity and Clinical Issues – WPATH Symposium, Bangkok, Thailand, 2014; Argosy College, Chicago, Illinois, 2010; Cultural Impact Conference, Chicago, Illinois, 2005; Weiss Hospital, Department of Surgery, Chicago, Illinois, 2005; Resurrection Hospital Ethics Committee, Evanston, Illinois, 2005; Wisconsin Public Schools, Sheboygan, Wisconsin, 2004, 2006, 2009; Rush North Shore Hospital, Skokie, Illinois, 2004; Nine Circles Community Health Centre, University of Winnipeg, Winnipeg, Canada, 2003; James H. Quillen VA Medical Center, East Tennessee State University, Johnson City, Tennessee, 2002; Sixth European Federation of Sexology, Cyprus, 2002; Fifteenth World Congress of Sexology, Paris, France, 2001; Illinois School of Professional Psychology, Chicago, Illinois 2001; Lesbian Community Cancer Project, Chicago, Illinois 2000; Emory University Student Residence Hall, Atlanta, Georgia, 1999; Parents, Families and Friends of Lesbians and Gays National Convention, Chicago, Illinois, 1998; In the Family Psychotherapy Network National Convention, San Francisco, California, 1998; Evanston City Council, Evanston, Illinois 1997; Howard Brown Community Center, Chicago, Illinois, 1995; YWCA Women's Shelter, Evanston, Illinois, 1995; Center for Addictive Problems, Chicago, 1994

Psychosocial Assessment of Risk and Intervention Strategies in Prenatal Patients- St. Francis Hospital, Center for Women's Health, Evanston, Illinois, 1984; Purdue University School of Nursing, West Layette, Indiana, 1980

Psychonuerоimmunology and Cancer Treatment- St. Francis Hospital, Evanston, Illinois, 1984

Psychosexual Factors in Women's Health- St. Francis Hospital, Center for Women's Health, Evanston, Illinois, 1984

Sexual Dysfunction in Medical Practice- St. Francis Hospital, Dept. of OB/GYN, Evanston, Illinois, 1980

Sleep Apnea - St. Francis Hospital, Evanston, Illinois, 1996; Lincolnwood Public Library, Lincolnwood, Illinois, 1996

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“The Work of Worrying: Emotional Preparation for Labor,” Pregnancy as Healing. A Holistic Philosophy for Prenatal Care, Peterson, G. and Mehl, L. Vol. II. Chapter 13, Mindbody Press, 1985.

PROFESSIONAL AFFILIATIONS

University of Minnesota Medical School –Leadership Council
American College of Forensic Psychologists
World Professional Association for Transgender Health
Advisory Board, Literature for All of Us
American Psychological Association
American College of Forensic Examiners
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Screenwriters and Actors Guild
Board of Directors, Chiaravalle Montessori School
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AWARDS AND HONORS

Phi Beta Kappa, 1971
Indiana University Women’s Honor Society, 1969-1972
Indiana University Honors Program, 1969-1972
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Representative, Student Governing Commission,
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Clinical Psychologist, State of Illinois, 1980

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