

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

JANE DOE 1, JANE DOE 2, JANE DOE 3,  
JANE DOE 4, JANE DOE 5, JOHN DOE 1,  
REGAN V. KIBBY, and DYLAN KOHERE,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; JAMES N.  
MATTIS, in his official capacity as Secretary of  
Defense; JOSEPH F. DUNFORD, JR., in his  
official capacity as Chairman of the Joint Chiefs  
of Staff; the UNITED STATES DEPARTMENT  
OF THE ARMY; RYAN D. MCCARTHY, in  
his official capacity as Secretary of the Army;  
the UNITED STATES DEPARTMENT OF  
THE NAVY; RICHARD V. SPENCER, in his  
official capacity as Secretary of the Navy; the  
UNITED STATES DEPARTMENT OF THE  
AIR FORCE; HEATHER A. WILSON, in her  
official capacity as Secretary of the Air Force;  
the UNITED STATES COAST GUARD;  
ELAINE C. DUKE, in her official capacity as  
Secretary of Homeland Security; the DEFENSE  
HEALTH AGENCY; RAQUEL C. BONO, in  
her official capacity as Director of the Defense  
Health Agency; and the UNITED STATES OF  
AMERICA,

Defendants.

Civil Action No. 17-cv-1597 (CKK)

**DECLARATION OF KEVIN M. LAMB  
IN SUPPORT OF PLAINTIFFS' APPLICATION FOR PRELIMINARY INJUNCTION**

I, Kevin M. Lamb, hereby declare:

1. All facts set forth herein are based on my personal knowledge, and if called upon to testify as to the contents of this Declaration, I could and would do so.

2. I am an attorney with the law firm of Wilmer Cutler Pickering Hale and Dorr,

counsel for Plaintiffs in the above-captioned matter.

3. I provide this declaration in support of Plaintiffs' Application for a Preliminary Injunction.

4. Attached hereto as **Exhibit A** is a true and correct copy of a Presidential Memorandum for the Secretary of Defense and Secretary of Homeland Security, dated August 25, 2017 with the subject "Military Service by Transgender Individuals," obtained from the website <https://www.whitehouse.gov/the-press-office/2017/08/25/presidential-memorandum-secretary-defense-and-secretary-homeland> on August 31, 2017.

5. Attached hereto as **Exhibit B** is a true and correct copy of a report by the Palm Center, dated March 2014 with the title "Report of the Planning Commission on Transgender Military Service," obtained from the website <http://archive.palmcenter.org/files/Transgender%20Military%20Service%20Report.pdf> on August 31, 2017.

6. Attached hereto as **Exhibit C** is a true and correct copy of Release No. NR-250-17, dated June 30, 2017 with the subject "Statement by Chief Pentagon Spokesperson Dana W. White on Transgender Accessions," obtained from the website <https://www.defense.gov/News/News-Releases/News-Release-View/Article/1236145/statement-by-chief-pentagon-spokesperson-dana-w-white-on-transgender-accessions> on August 31, 2017.

7. Attached hereto as **Exhibit D** is a true and correct copy of Department of Defense Release No. NR-312-17, dated August 29, 2017 with the title "Statement by Secretary of Defense Jim Mattis on Military Service by Transgender Individuals," obtained from the website <https://www.defense.gov/News/News-Releases/News-Release-View/Article/1294351/statement-by-secretary-of-defense-jim-mattis-on-military-service-by-transgender> on August 31, 2017.


8. Attached hereto as **Exhibit E** is a true and correct copy of a news article by Noah

Michelson, dated August 1, 2017 with the title “56 Retired U.S. Generals And Admirals Blast Trump’s Military Ban,” obtained from the website [http://www.huffingtonpost.com/entry/56-generals-admirals-trump-trans-military-ban\\_us\\_5980abb2e4b00bb8ff39fced](http://www.huffingtonpost.com/entry/56-generals-admirals-trump-trans-military-ban_us_5980abb2e4b00bb8ff39fced) on August 31, 2017.

9. Attached hereto as **Exhibit F** is a true and correct copy of “Remarks on Ending the Ban on Transgender Service in the U.S. Military As Delivered by Secretary of Defense Ash Carter,” dated June 30, 2016, obtained from the website <https://www.defense.gov/News/Speeches/Speech-View/Article/821833/remarks-on-ending-the-ban-on-transgender-service-in-the-us-military> on August 31, 2017.

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

Dated: August 31, 2017  
Washington, D.C.

  
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Kevin M. Lamb