

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ACADEMY OF HIV
MEDICINE; et al.,

Plaintiffs,

v.

HEALTH RESOURCES AND SERVICES
ADMINISTRATION; et al.,

Defendants.

Case No. 1:26-cv-12638-WGY

**JOINT STIPULATION REGARDING PROTECTIVE ORDER AND PSEUDONYMITY
FOR CERTAIN ASSOCIATIONAL PLAINTIFFS' MEMBERS**

On June 10, 2026, Plaintiffs filed a Motion for Protective Order and for Leave to Permit Associational Plaintiffs' Members to Proceed Pseudonymously (Dkt. 6). The Parties have since reached an agreement on a proposed protective order for certain Associational Plaintiffs' members, attached as **Exhibit A** to this joint stipulation. A proposed order is enclosed hereto.

WHEREFORE, the Plaintiffs and Defendants respectfully request that this Court enter the attached agreed-upon Protective Order.

Should the Court enter the agreed upon proposed protective order attached as **Exhibit A**, Plaintiffs withdraw their Motion for Protective Order (Dkt. 6).

Dated: September 8, 2026

Respectfully submitted,

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**[PROPOSED] AGREED PROTECTIVE ORDER PERMITTING PSEUDONYMITY
FOR CERTAIN ASSOCIATIONAL PLAINTIFFS' MEMBERS**

This matter is before the Court on Parties' Joint Stipulation Permitting Protective Order and Pseudonymity for Certain Associational Plaintiffs' Members.

The Court finds that the Parties are in agreement and that there is good cause to enter the proposed protective order. *See Doe v. Massachusetts Inst. of Tech.*, 46 F.4th 61, 72 (1st Cir. 2022). The Court finds that limiting disclosure of the individual identities of the non-party declarant members of the American Academy of HIV Medicine, the HIV Medicine Association, and the International Association of Providers of AIDS Care ("the Associational Plaintiffs") is necessary to protect their privacy and safety and to ensure that these individuals' participation in this litigation cannot be used in a retaliatory manner. The Court further finds that the non-party declarant members of the Associational Plaintiffs will likely experience a significant risk of harm absent the requested relief, and that absent such an order, future declarants are likely to be chilled in providing important accounts of federal conduct.

Accordingly, the Court hereby **ORDERS** as follows:

1. Nurse Practitioner Danielle Doe and Dr. Rachel Roe, who are members of Associational Plaintiffs, may proceed under the pseudonyms “Danielle Doe” and “Rachel Roe.”

2. All publicly filed documents shall identify Pseudonymous Declarants by their pseudonyms.

3. All documents filed with the Court that contain a Pseudonymous Declarant’s true name or Other Identifying Information shall be redacted.

4. For the purposes of this order, “Other Identifying Information,” means information, whether considered individually or collectively, that identifies any Pseudonymous Declarant directly or indirectly and may include but is not limited to names of institutions or clinics employing, sponsoring or otherwise affiliated with these declarants; current or former institutional or clinical position titles; grant award numbers; project names or other information about the subject matter of the declarants’ work that is sufficiently unique so as to be identifying; grant project or budget start and end dates; grant award amounts; and any other potentially identifying information.

5. Plaintiffs’ counsel shall disclose the Pseudonymous Declarants’ true names and, to the extent otherwise discoverable under the Federal Rules of Civil Procedure, Other Identifying Information, upon request to Defendants’ counsel and the Court.

6. To the extent the identities of Declarants Danielle Doe and Rachel Roe are disclosed to Defendants’ Counsel of Record, Defendants’ counsel shall not disclose these Pseudonymous Declarants’ names or any Other Identifying Information to any person, except (a) to employees or other agents, but only to the extent necessary to litigate this action, (b) to Defendants, their counsel, or any of the Defendants’ employees or other agents, but only to the extent necessary to litigate

this action, or (c) as otherwise explicitly authorized by any protective order subsequently entered in this action concerning discovery procedures and protection of confidential information including Other Identifying Information.

7. Any person to whom such disclosure is made shall not use that information for any purpose other than as necessary to litigate this action.

8. Any person to whom disclosure of these Pseudonymous Declarants' names or any Other Identifying Information is made shall not use that information for any purpose other than as necessary to litigate this action and shall not further disclose the fact of Pseudonymous Declarants' participation in this litigation or any Other Identifying Information learned through this disclosure, either directly or indirectly, without the advance written consent of Plaintiffs' counsel.

9. Defendants' Counsel of Record shall ensure that all persons to whom disclosure is made under this Order have read and agree in writing and under penalty of perjury to be bound by this Order and to be subject to the Court's jurisdiction for purposes of enforcing this Order.

10. No part of the restrictions imposed by this Protective Order may be terminated except by written stipulation of the parties or by other order of this Court for good cause shown. The final disposition of this litigation shall not relieve any person who has received the name or Other Identifying Information of Pseudonymous Declarants from the obligations imposed by this Order.

IT IS SO ORDERED.

Dated this ____ day of _____, 2026

BY THE COURT:
