

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

DANIEL DOE, GREGORY GOE,
CHARLOTTE COE,
PATRICK POE,
and RILEY ROE, on behalf of themselves and
all persons similarly situated,

Plaintiffs,

vs.

SCOTT KUPOR, in his official capacity as
Director of the UNITED STATES OFFICE
OF PERSONNEL MANAGEMENT
1900 E Street N.W.
Washington, D.C. 20530

Defendant.

PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYMS, TO FILE UNDER SEAL, AND FOR PROTECTIVE ORDER

Plaintiffs Daniel Doe, Charlotte Coe, Gregory Goe, and Riley Roe, transgender and nonbinary individuals, and Plaintiff Patrick Poe, parent of a transgender minor child, hereby seek authorization to proceed under pseudonyms. Plaintiffs challenge Defendant's elimination of insurance coverage for gender-affirming care under the Federal Employee Health Benefits Program (FEHB) and the Postal Service Health Benefits Program (PSHB). Plaintiffs wish to proceed under pseudonyms to protect their privacy. In light of their status as transgender and nonbinary individuals, or persons with transgender or nonbinary dependents, Plaintiffs are concerned about the social stigmatization, harassment, retaliation, discrimination, and potential violence they may experience from others that could cause physical and mental harm if their identity is disclosed to the public.

Plaintiffs therefore respectfully request that this Court: (1) grant their motion to proceed under pseudonyms; (2) grant their motion to seal identifying information about the Plaintiffs; and (3) enter a protective order that prohibits Defendant's counsel from revealing Plaintiffs' identifying information and prohibits any of the following information that could be used to identify Plaintiffs from being publicly filed in this action or disclosed to persons other than Defendant's counsel and personnel of the Office of Personnel Management who directly have a need for access to such information for the purposes of preparing the defense of this litigation:

- (i) Plaintiffs' biographical details, including but not limited to their age, state or place of residence, current and former names, and date of birth;
- (i) Information regarding Plaintiffs' Agency subcomponent or office in which they are employed or were employed, including their job title and supervisor;
- (ii) All details of Plaintiffs' and their dependents' medical history, records, treatments, and specific physical and mental health diagnoses of any kind; and
- (iii) Any other information that could reveal Plaintiffs' true identities.

As counsel for Defendant has not yet entered an appearance, Plaintiffs' counsel did not seek consent prior to the filing of this Motion.

Date: August 3, 2026

Respectfully submitted,

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**UNITED STATES DISTRICT COURT
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DANIEL DOE, GREGORY GOE,
CHARLOTTE COE,
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1900 E Street N.W.
Washington, D.C. 20530

Defendant.

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO
PROCEED UNDER PSEUDONYMS AND FOR PROTECTIVE ORDER**

Plaintiffs Daniel Doe, Charlotte Coe, Gregory Goe, and Riley Roe, transgender and nonbinary individuals, and Plaintiff Patrick Poe, parent of a transgender minor child, are challenging Defendant's elimination of insurance coverage for gender-affirming care under the Federal Employee Health Benefits Program (FEHB) and the Postal Service Health Benefits Program (PSHB). Plaintiffs wish to proceed under pseudonyms to protect their privacy.

The Court should grant Plaintiffs' motion to proceed under pseudonyms and for a protective order to seal identifying information about the Plaintiffs. Some of the Plaintiffs have experienced harassment or threats because of their gender identities or that of their dependent that

¹ Pursuant to Local Civil Rule 5.1(c)(1), the names and residential addresses of Plaintiffs have been filed under seal with the Court in a separate Notice of Filing. Plaintiffs are seeking to proceed under pseudonyms pursuant to their separately filed Motion for Leave to Proceed Under Pseudonyms and For Protective Order. References to Plaintiffs herein will be by their pseudonyms.

have reasonably led them to fear for their safety. Moreover, a person's transgender status and medical condition are sensitive and highly personal matters. Forcing Plaintiffs to disclose their identities in public court records would require them to expose deeply personal information and subject them to the possibility of significant harm, including social stigmatization, harassment, retaliation, discrimination, and potential violence. For the same reasons, Plaintiffs further request that the Court order that any document revealing their true identities, or any information or distinguishing characteristics that could reveal their true identities, be filed under seal pursuant to applicable Court rules.

I. The Court Should Grant the Motion in Its Entirety.

A. Plaintiffs and Their Dependents Should Be Permitted to Proceed Under Pseudonyms.

In considering plaintiffs' legitimate interest in anonymity against the countervailing interests in favor of disclosure, courts apply a flexible and fact-driven balancing test, which assesses five "non-exhaustive factors," including:

- (1) whether the justification asserted by the requesting party is merely to avoid the annoyance and criticism that may attend any litigation or is to preserve privacy in a matter of a sensitive and highly personal nature;
- (2) whether identification poses a risk of retaliatory physical or mental harm to the requesting party or, even more critically, to innocent non-parties;
- (3) the ages of the persons whose privacy interests are sought to be protected;
- (4) whether the action is against a governmental or private party; and relatedly,
- (5) the risk of unfairness to the opposing party from allowing an action against it to proceed anonymously.

In re Sealed Case, 971 F.3d 324, 326–27 (D.C. Cir. 2020) (quoting *In re Sealed Case*, 931 F.3d 92, 97 (D.C. Cir. 2019)) (cleaned up).

The first factor strongly weighs in favor of anonymity. Plaintiffs do not seek to proceed under pseudonyms "merely to avoid the annoyance and criticism that may attend any litigation," but to "preserve privacy in a matter of [a] sensitive and highly personal nature." *Id.* at 326. The

D.C. Circuit has held that a sensitive or highly personal matter “commonly involves intimate issues such as sexual activities, reproductive rights, bodily autonomy, medical concerns, or the identity of abused minors.” *Jones v. Trump*, No. 25-401 (UNA), 2025 U.S. Dist. LEXIS 26370 (D.D.C. Feb. 13, 2025) (citing *In re Sealed Case*, 971 F.3d at 327); *see also Charles H. v. District of Columbia*, Case: 1:21-cv-00997, 2021 U.S. Dist. LEXIS 252646, at *2 (D.D.C. Apr. 9, 2021) (“The . . . medical histories of plaintiffs . . . are paradigmatically sensitive and highly personal.”) (cleaned up). Here, as in *Jones v. Trump*, 2025 U.S. Dist. LEXIS 26370, in which the District Court granted the motion for the plaintiffs to proceed under pseudonyms, Plaintiffs or their dependents have been diagnosed with gender dysphoria, a serious medical condition. *See also Doe v. McHenry*, No. 25-286 (JEB), 2025 U.S. Dist. LEXIS 34937, at *10 (D.D.C. Jan. 31, 2025) (granting motion to proceed under pseudonyms where “Plaintiffs state that their ‘medical diagnoses of gender dysphoria, bodily autonomy, medical treatment, and medical and mental health histories’ are integral to this case”).

In this case, the privacy interests of Plaintiffs are paramount. The information disclosed in the Complaint (Dkt. No. 1) and information likely to be disclosed during discovery is highly personal. Plaintiffs’ involvement in this case will expose their or their dependents’ transgender status, which is private, and sensitive information about the difference in their own or their dependents’ assigned sex at birth and gender identities. As the Second Circuit has explained: “The excruciatingly private and intimate nature of [being transgender], for persons who wish to preserve privacy in the matter, is really beyond debate.” *Powell v. Schriver*, 175 F.3d 107, 111 (2d Cir. 1999). Other courts have come to the same conclusion. *See, e.g., Love v. Johnson*, 146 F. Supp. 3d 848, 856 (E.D. Mich. 2015) (finding that disclosure of transgender status “creates a very real threat to Plaintiffs’ personal security and bodily integrity”); *K.L. v. State, Dep’t of Admin., Div. of*

Motor Vehicles, No. 3AN-11-05431-CI, 2012 WL 2685183, at *6 (Alaska Super. Ct. Mar. 12, 2012) (“The Court agrees that one’s transgender[] status is private, sensitive personal information” and “is entitled to protection.”). One’s gender identity is “among the most intimate parts of one’s life.” *Doe v. Blue Cross & Blue Shield of R.I.*, 794 F. Supp. 72, 74 (D.R.I. 1992); *see also Arroyo Gonzalez v. Rossello Nevares*, 305 F. Supp. 3d 327, 333 (D.P.R. 2018) (“Much like matters relating to marriage, procreation, contraception, family relationships, and child rearing, ‘there are few areas which more closely intimate facts of a personal nature’ than one’s transgender status.”) (citation omitted). The matter will involve issues relating to the Plaintiffs’ medical treatment, medical care and medical history, all highly sensitive and personal information.

As in *Doe v. McHenry*, although the matter involves a policy adopted by the President on a controversial topic, the information sought to be sealed is only to obscure information that could be used to identify the Plaintiffs and their dependents. *See* 2025 U.S. Dist. LEXIS 34937, at *6. There are no redacted portions of the Complaint and thus, the public will be able to understand the allegations made. This “targeted” request further weighs in favor of anonymity. *Id.*

The second factor also favors anonymity. There exists a real risk of retaliatory physical and mental harm to Plaintiffs and their dependents. Plaintiffs and their dependents are certainly at risk of retaliatory physical and mental harm, as some of them have already suffered from it when they have disclosed their transgender status or were perceived as transgender by others. As detailed in the Complaint, the current presidential administration has targeted and purported to remove established legal protections and employment opportunities for transgender individuals. *See* Compl. at ¶¶38–41, Dkt. No. 1. Several Plaintiffs would be prepared to attest that strangers have verbally harassed them in the past, leading them to have significant, well-founded fears for their safety. A robust body of case law recognizes that those publicly identified as transgender are at

particularly high risk of hostility, harassment, and assault. *See Flack v. Wis. Dept. of Health Servs.*, 328 F. Supp. 3d 931, 953 (W.D. Wis. 2018) (“In short, other than certain races, one would be hard-pressed to identify a class of people more discriminated against historically or otherwise more deserving of the application of heightened scrutiny when singled out for adverse treatment, than transgender people.”); *Brocksmith v. United States*, 99 A.3d 690, 698 n. 8 (D.C. 2014) (“The hostility and discrimination that transgender individuals face in our society today is well-documented.”); *Whitaker v. Kenosha Unified Sch. Dist. No. 1 Bd. of Educ.*, 858 F.3d 1034, 1051 (7th Cir. 2017) (“There is no denying that transgender individuals face discrimination, harassment, and violence because of their gender identity.”); *Evancho v. Pine-Richland Sch. Dist.*, 237 F. Supp. 3d 267, 288 (W.D. Pa. 2017) (“[T]ransgender people as a class have historically been subject to discrimination”); *Bd. of Educ. of the Highland Loc. Sch. Dist. v. U.S. Dep’t of Educ.*, 208 F. Supp. 3d 850, 874 (S.D. Ohio 2016); *Adkins v. New York*, 143 F. Supp. 3d 134, 139 (S.D.N.Y. 2015). Accordingly, transgender people have a strong interest in preserving their confidentiality of their medical treatments. *See Powell*, 175 F.3d at 111.

The threat of physical harm to transgender individuals due to the disclosure of their transgender status is real. A recent large national survey found that 39% of transgender respondents had been harassed online in the last year, and 9% had been denied equal treatment or services.² As one court recognized, “there exist numerous documented instances of those targeted for violence based on their . . . gender identity.” *In re E.P.L.*, 891 N.Y.S.2d 619, 621 (N.Y. Sup. Ct. 2009); *see also Sacklow v. Betts*, 163 A.3d 367, 374 (Super. Ct. Ch. Div. 2017); *Corbitt v. Taylor*, 513 F. Supp. 3d 1309, 1314 (M.D. Ala. 2021).

² Sandy E. James, Jody L. Herman, Laura E. Durso, & Rodrigo Heng-Lehtinen, *Early Insights: A Report of the 2022 U.S. Transgender Survey*, Advocates for Trans Equality (Feb. 2024), https://transequality.org/sites/default/files/2024-02/2022%20USTS%20Early%20Insights%20Report_FINAL.pdf.

For these and similar reasons, courts regularly allow transgender plaintiffs to proceed under pseudonyms. *See, e.g., In re E.P.L.*, 891 N.Y.S.2d at 621 (shielding the publication of a transgender individual’s name in seeking a court order regarding a name change based upon his “right to feel threatened for his personal safety in the event his transgender status is made public,” even though he had not personally experienced any violence based on his gender identity); *Meriwether v. Trs. of Shawnee State Univ.*, No. 1:18-CV-753, 2019 WL 2392958, at *2–4 (S.D. Ohio Jan. 30, 2019); *Ray v. Dir., Ohio Dep’t. of Health*, No. 2:18-CV-272, 2018 WL 8804858, at *1 (S.D. Ohio Apr. 5, 2018); *Bd. of Educ. of the Highland Loc. Sch. Dist.*, 2016 WL 4269080, at *5; *Love*, 146 F. Supp. 3d 848; *Doe v. United Consumer Fin. Servs.*, No. 1:01 CV 1112, 2001 U.S. Dist. LEXIS 25509 (N.D. Ohio Nov. 9, 2001); *Blue Cross & Blue Shield of R.I.*, 794 F. Supp. at 74 (allowing transgender plaintiff to proceed pseudonymously because, as a transgender person, “plaintiff’s privacy interest is both precious and fragile, and this Court will not cavalierly permit its invasion”).

As in *Jones*, 2025 U.S. Dist. LEXIS 26370, at *5, publicly associating Plaintiffs’ and their dependents’ identities and medical history would expose them to risk and cause severe anxiety and stress. Also, given that the nature of this case suggests that it may gain significant press coverage, Plaintiffs and their dependents could face widespread criticism and harassment from the public if not granted anonymity. So, too, public identification of their identities to their employing agencies (such as USPS, Department of State) may expose them to retaliation. The Administration’s Executive Order, “Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government,” also causes the Plaintiffs grave concern about further retaliation against them and their livelihoods in their efforts to oppose the President’s discriminatory actions against transgender individuals.

The third factor also weighs in favor of anonymity. Plaintiff Poe’s dependent transgender daughter is a minor. *See* J. L. Herman, & E. Redfield, The Williams Institute, UCLA School of Law, *The Impact of Changes to the Federal Employee Health Benefits Program on Transgender People* at 3 (2026), <https://williamsinstitute.law.ucla.edu/wp-content/uploads/FEHB-Trans-Impact-Jul-2026.pdf>.

The fourth factor also weighs in favor of granting the Plaintiffs’ Motion. Typically, “anonymous litigation is more acceptable when the defendant is a governmental body because government defendants ‘do not share the concerns about “reputation” that private individuals have when they are publicly charged with wrongdoing.’” *J.W. v. District of Columbia*, 318 F.R.D. 196, 201 (D.D.C. 2016) (quoting *Doe v. Cabrera*, 307 F.R.D. 1, 8 (D.D.C. 2014)); *see also Doe I v. George Wash. Univ.*, 369 F. Supp. 3d 49, 66 (D.D.C. 2019). Because the Plaintiffs will be requesting an injunction as well as individual relief, this factor favors pseudonymity. *See, e.g., Doe v. Blinken*, No. 24-1629 (JEB), 2024 U.S. Dist. LEXIS 242095, at *5 (D.D.C. June 11, 2024) (“When a plaintiff requests individualized relief against a government defendant—as here, where Doe challenges a yearlong delay in adjudicating his SIV application—the fourth factor favors pseudonymity.”) (citation omitted); *Doe v. U.S. Immigr. & Customs Enf’t*, No. 24-617, 2024 U.S. Dist. LEXIS 241801, at *5 (D.D.C. Mar. 8, 2024) (fourth factor supported pseudonymity where “[p]laintiff allege[d] deficiencies in ICE’s compliance with FOIA solely with respect to his individual request”). Plaintiffs’ identities are incidental to the litigation, which concerns whether the Government’s prohibition on gender-affirming care for transgender individuals is discrimination on the basis of sex. As this Court has recognized, the public has an interest in the legal issues being litigated, “not the personal details of the litigants bringing those [] claims.” *Haitian Bridge All. v. Biden*, 2021 WL 12244207, at *3 (D.D.C. Dec. 23, 2021); *see also Int’l*

Refugee Assistance Project, No. TDC-17-0361, 2017 U.S. Dist. LEXIS 29058, at *10 (D. Md. Mar. 1, 2017) (“[T]he public interest in the identity of the Doe Plaintiffs is reduced because the claim is a pure legal challenge to the Executive Order, such that the individual plaintiffs play only a minor role in the litigation.”).

Finally, the fifth factor also supports Plaintiffs’ motion. Defendant will suffer no unfairness if the Motion is granted because it is already aware of Plaintiffs’ identities. *See In re Sealed Case*, 971 F.3d at 326 n. 1 (potential for unfairness from proceeding pseudonymously “is not implicated” where the defendant knows the plaintiff’s identity). Plaintiffs filed complaints through the administrative Equal Employment Opportunity process, in which they disclosed their identities to Defendant. An order would not compromise the Defendant’s ability to conduct its defense.

As the factors all favor pseudonymity, the Court should grant Plaintiffs’ motion. This matter is similar to other cases in the D.C. Circuit and beyond in which courts have recognized that the privacy interests of transgender plaintiffs outweigh the public’s interest in knowing the specific identities of such individuals.

B. The *Hubbard* Factors Weigh in Favor of Sealing.

For similar reasons that justify proceeding under pseudonyms, Plaintiffs request that the Court direct that any document revealing their identity, or any information or distinguishing characteristics that could reveal their identity, be filed under seal in accordance with the Court’s rules. The identifying information to be filed under seal includes but is not limited to: (1) the names of Plaintiffs and their family members and dependents; (2) the specific agency subcomponent or office in which they work or worked; (3) any other information that could reveal their true identities, such as their job title, supervisor, or state of residence. Plaintiffs further request that the Court direct that Defendant may not share sealed documents, or confidential information contained

within sealed documents, with anyone other than counsel for Defendants or with personnel of the Office of Personnel Management who directly have a need for access to such information for the purposes of preparing the defense of this litigation.

Federal Rule of Civil Procedure 26(c) specifically authorizes the Court, upon motion of a party, to “issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense.” A movant must only show good cause to receive the protection of Rule 26(c) and, once good cause is shown, the Court has “broad discretion . . . to decide when a protective order is appropriate and what degree of protection is required.” *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 36 (1984). In this instance, there is simply no need for the public to know the identities of the Plaintiffs. “If there is no public interest in the disclosure of certain information, ‘something, even a modest privacy interest, outweighs nothing every time.’” *Horowitz v. Peace Corps*, 428 F.3d 271, 278 (D.C. Cir. 2005) (quoting *Nat’l Ass’n of Retired Fed. Emps. v. Horner*, 879 F.2d 873, 879 (D.C. Cir. 1989)).

While Federal Rule of Civil Procedure 10(a) generally requires that the complaint “name all parties,” courts engage in the six-factor inquiry described in *United States v. Hubbard*, 650 F.2d 293 (D.C. Cir. 1980), to determine whether sealing is appropriate: (1) the need for public access to the documents at issue; (2) the extent of previous public access to the documents; (3) that someone has objected to disclosure, and the identity of that person; (4) the strength of any property and privacy interests asserted; (5) the possibility of prejudice to those opposing disclosure; and (6) the purposes for which the documents were introduced during the judicial proceedings. *Id.* at 317–22. In this case, the *Hubbard* factors weigh decidedly in support of requiring the sealing of portions of documents that would reveal the identities of Plaintiffs or their dependents.

The first factor, the need for public access to the documents at issue, weighs in favor of sealing. Plaintiffs acknowledge that the matter generally is of public interest as the Government is a party, and the public has an interest in knowing the positions that its elected officials and government agencies take in litigation. But the public will still have access to such information, as it would not be subject to sealing (indeed, the entire Complaint in this matter is unredacted). The only information that Plaintiffs request be sealed is information that may reveal the identities of the Plaintiffs or their dependents. Any redactions would therefore “serve merely to obscure information that identifies [them]” and those details “are not critical in aiding the public’s understanding of the allegations made.” *Jones*, 2025 U.S. Dist. LEXIS 26370, at *8. This “targeted” request weighs in favor of sealing. *See McHenry*, 2025 U.S. Dist. LEXIS 34937, at *6 (sealing information that might be used to identify transgender women incarcerated in federal prisons who challenged denial of gender-affirming health care).

Regarding the second factor, the extent of public access to the information, the Court “should consider the public’s previous access to the sealed information, not its previous access to the information available in the overall lawsuit.” *Id.*, (citing *CNN v. FBI*, 984 F.3d 114, 119 (D.C. Cir. 2021)). As in *Doe v. McHenry*, “the public has access to the overall subject of this suit”—here, challenges brought by current and former federal employees to the OPM Carrier Letters. *Id.* However, the public has never had access to the information that Plaintiffs wish to be sealed, including Plaintiffs and their dependents’ identities, associated medical records, and other sensitive private information. *See id.* Indeed, the Privacy Act, 5 U.S.C. § 552(a), already restricts the disclosure of records of federal employees absent the written consent of the individual. Thus, this factor also weighs in favor of sealing so that Plaintiffs’ identities are not revealed.

The third factor similarly weighs in favor of sealing. Plaintiffs have moved to seal the record, and thus it weighs in favor of the Motion. *See McHenry*, 2025 U.S. Dist. LEXIS 34937, at* 7 (citing *Zapp v. Zhenli Ye Gon*, 746 F. Supp. 2d 145, 149 (D.D.C. 2010)).

The fourth *Hubbard* factor, “the strength of any property and privacy interests asserted,” weighs strongly in favor of sealing. *EEOC v. Nat’l Children’s Ctr.*, 98 F.3d 1406, 1409 (D.D.C. 1996) (citing *Hubbard*, 650 F.2d at 317–22). *Hubbard* itself contemplated that “[v]alid privacy interests might be asserted . . . in documents which reveal the intimate details of individual lives, sexual or otherwise.” *Hubbard*, 650 F.2d at 324. Plaintiffs seek to seal information that personally identifies them, thus revealing details of their medical diagnoses and gender identities. As illustrated above and herein, courts in this jurisdiction regularly permit parties to proceed under a pseudonym in such circumstances, *McHenry*, 2025 U.S. Dist. LEXIS 34937, at *8 (citing *V.C. v. District of Columbia*, No. 23-1139, ECF No. 5 (Mem. Op.) at 3 (D.D.C. Apr. 27, 2023); *Doe v. Spahn*, No. 23-2859, ECF No. 7 (Mem. Op.) at 3 (D.D.C. Oct. 2, 2023)), and those reasons weigh strongly in favor of sealing.

The fifth factor—the possibility of prejudice to those opposing disclosure—is neutral as disclosure would not cause prejudice in future litigation. *See Friedman v. Sebelius*, 672 F. Supp. 2d 54, 60–61 (D.D.C. 2009); *M.A. v. Mayorkas*, No. 23-1843 (JEB), 2023 U.S. Dist. LEXIS 146323, at *16 (D.D.C. July 6, 2023) (where “disclosure would not appear to prejudice either party [t]his factor is . . . neutral.”).

The sixth and final factor concerns “the purposes for which the documents were introduced.” *Nat’l Children’s Ctr.*, 98 F.3d at 1409 (citing *Hubbard*, 650 F.2d at 317–22). Where a party seeks to seal only limited portions of the pleadings that are not at issue in the case, this factor favors sealing. *See Doe v. Noem*, No. CV 25-769, 2025 U.S. Dist. LEXIS 61010, at *12

(D.D.C. Mar. 31, 2025); *Gilliard v. McWilliams*, No.: 16-2007 (RC), 2019 U.S. Dist. LEXIS 122339, at *15 (D.D.C. July 23, 2019) (“There is ‘less of a pressing concern to unseal [records] if they are not relevant to the claims.’”) (quoting *United States ex. rel. Durham v. Prospect Waterproofing*, 818 F. Supp. 2d 64, 69 (D.D.C. 2011)). Here, the sixth factor thus weighs in favor of sealing.

In sum, the *Hubbard* factors strongly support sealing limited portions of documents in the case to prevent the identities of the transgender Plaintiffs and their dependents from becoming public.

II. Conclusion

Plaintiffs respectfully request that the Motion be granted. A proposed order is filed herewith.

Date: August 3, 2026

Respectfully submitted,

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**UNITED STATES DISTRICT COURT
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all persons similarly situated,

Plaintiffs,

vs.

SCOTT KUPOR, in his official capacity as
Director of the UNITED STATES OFFICE
OF PERSONNEL MANAGEMENT
1900 E Street N.W.
Washington, D.C. 20530

Defendant.

[PROPOSED] ORDER

Upon consideration of Plaintiffs’ Motion for an order granting authorization to proceed under pseudonyms in the above-captioned matter, to seal identifying information about the Plaintiffs, and for a protective order (the “Motion”), and any opposition thereto, if any, and having considered the arguments of counsel, if any, in connection with this Motion; and for good cause shown:

IT IS on this day of , 2026, **ORDERED** that

1. Plaintiffs' Motion is **GRANTED**;
2. Plaintiffs are permitted to proceed under pseudonyms during the duration of the case;
3. Plaintiffs may seal identifying information about themselves;

4. Plaintiffs' identities, and any of the following information that could be used to identify them, shall not be publicly filed or disclosed to persons other than Defendants' counsel and personnel of the Office of Personnel Management who directly have a need for access to such information for the purposes of preparing the defense of this litigation:
 - a. Plaintiffs' biographical details, including but not limited to their age, state or place of residence, current and former names, and date of birth;
 - b. Information regarding Plaintiffs' Agency subcomponent or office in which they are employed or were employed, including their job title and supervisor;
 - c. All details of Plaintiffs' medical history, records, treatments, and specific physical and mental health diagnoses of any kind; and
 - d. Any other information that could reveal Plaintiffs' true identities.

United States District Judge