

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

---

|                          |   |                                   |
|--------------------------|---|-----------------------------------|
| BROCK STONE, et al.,     | ) |                                   |
|                          | ) |                                   |
| <i>Plaintiffs,</i>       | ) |                                   |
|                          | ) |                                   |
| v.                       | ) | Civil Action No. 17-cv-2459 (MJG) |
|                          | ) |                                   |
| DONALD J. TRUMP, et al., | ) |                                   |
|                          | ) |                                   |
| <i>Defendants.</i>       | ) |                                   |

---

**DECLARATION OF RAYMOND EDWIN MABUS, JR. IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR CLARIFICATION  
AND, IF NECESSARY, A PARTIAL STAY OF PRELIMINARY INJUNCTION  
PENDING APPEAL**

I, Raymond Edwin Mabus, Jr., declare as follows:

1. As set forth in my previous declaration in this case signed and dated October 19, 2017, I was part of a Working Group that comprehensively reviewed military policy with regard to transgender people serving across the service branches. It was based upon that review and the recommendations of that group that the Department of Defense announced in June 2016 that it would begin allowing transgender people to serve openly in the military and would begin on July 1, 2017 also allowing accession by transgender people.

2. Based on my experience in military personnel and operations, allowing transgender candidates to apply for military service was not a complicated process to begin with, especially in light of the highly complex strategic, technical, personnel and medical issues that the military addresses day in and day out.

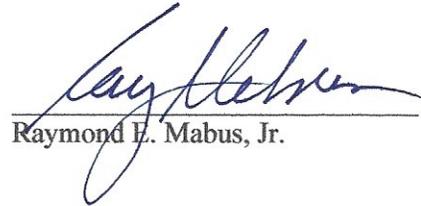
3. Based on my personal knowledge, the Services had already completed almost all of the necessary preparation for lifting the accession ban when I left office almost a year ago. It is

inconsistent with my understanding of the status of those efforts and the workings of military personnel to conclude that the military would not be prepared almost a year later—and six months after the date on which the policy was originally scheduled to take effect—to permit accessions by transgender people.

4. As set forth in my previous declaration, it is not the lifting of the ban on accession by qualified transgender individuals that will compromise military readiness, good order, and discipline; it is the sudden reversal of military policy and the treatment of loyal transgender Americans as second-class citizens that are the true sources of disruption.

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

DATED: December 12, 2017

  
Raymond E. Mabus, Jr.