

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

Brock Stone, et al.,

Plaintiffs,

v.

Donald J. Trump, et al.,

Defendants.

Case No. 1:17-cv-02459-MJG

**DECLARATION OF RYAN WOOD**  
**IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS'**  
**MOTION TO DISSOLVE THE PRELIMINARY INJUNCTION**

I, RYAN WOOD, hereby declare:

1. The facts set forth in this declaration are based on my personal knowledge.

**Personal Background Information**

2. I am twenty-four years old. I currently work at an aerospace company as an inventory control clerk. My background, however, is in firefighting, and I am certified as both a firefighter and an emergency medical technician.

3. I am a man.

4. I am transgender.

5. I disclosed my transgender identity to my family and friends in 2011.

6. I began undergoing hormone therapy as a medically-necessary part of my gender transition in 2011. I understand that I received a diagnosis for gender dysphoria around that time. In 2012, I underwent keyhole top surgery as a further medically-necessary part of my gender

transition. I do not anticipate requiring any further surgical care in connection with my gender transition.

7. In 2013, I updated all of my civilian records to accurately reflect my name and gender, including my records with the Department of Motor Vehicles, my birth certificate, my legal name and my records with the Social Security Administration.

8. I am in the process of enlisting in the United States Marine Corps, where I hope to work as a Firefighting and Air Rescue technician. I first met with a Marine Corps recruiter in January 2018, shortly after the ban on accessions by transgender individuals was lifted. Since then I have continued to actively work through the process with the recruiter to complete enlistment paperwork. I am currently working through the medical screening and clearance process. I understand that I have now submitted all necessary medical documentation and I am awaiting medical clearance. I have not been told an exact timetable on how long this process will take.

9. I am planning to join the Marine Corps for several reasons. First and foremost, I wish to serve and protect my country. Second, my father was in the United States Navy, and I have seen what it did for his life and career, and I want to follow his example. Third, military experience would significantly benefit my chosen career as a firefighter.

#### **Effect of the Transgender Service Member Ban**

10. Under the 2016 Open Service Directive currently in effect, I can enlist immediately because I meet all of its eligibility criteria. I have been stable without clinically significant distress or impairment as the result of gender dysphoria in social, occupational, or other important areas of functioning for more than 18 months. I have completed all medical treatment associated with my gender transition, been stable in my gender for more than 18 months, and have been stable on cross-sex hormone therapy post-gender transition for more than

18 months. More than 18 months have elapsed since the date of my most recent transition-related surgery and no functional limitations or complications persist, nor do I require any further surgery.

11. I have been working to enlist since the accessions ban was lifted at the beginning of this year.

12. However, under the terms of the Implementation Plan prepared by the Department of Defense in February 2018, I would be disqualified from military service because I have been diagnosed with gender dysphoria, I have undergone gender transition, and I have undergone surgery related to gender transition.

13. The Ban on military service by transgender individuals thus directly threatens my career because it will prevent me from enlisting. This will damage my personal and financial future, as it will deny me the opportunity to serve my country, follow my father's tradition of military service, and prevent me from growing my skills as a first responder.

14. The Ban has also created personal anxiety and uncertainty for me. I feel as though my service is being rejected and that I am unwanted. I have wanted to join the military since I was fourteen years old, and now that is in jeopardy. When the Open Service Directive was released in 2016, I was ecstatic. I began going to the gym six days a week to prepare myself to meet the physical training requirements.

15. When the Transgender Service Member Ban was announced last year it was devastating. Since then, it has been a roller coaster of emotions, some days feeling optimistic and others feeling like I am getting my hopes up for nothing.

16. The Ban also potentially impacts my current career. If I am not able to enlist, I want to return to my career in firefighting. However, I have been postponing doing that to pursue

military service. My first goal is to serve in the military, and I do not want to waste a fire department's time applying if I am going to leave to join the military. But if I am not able to enlist, I would have put my secondary career goals as a firefighter on hold for nothing.

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

Executed on the 23 day of April, 2018 in Puyallup, Washington.

A handwritten signature in cursive script, appearing to read "Ryan Wood", is written over a horizontal line.

RYAN WOOD