

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 2:17-cv-01297-MJP

**DECLARATION OF SARAH
WARBELOW IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

NOTE ON MOTION CALENDAR:
October 6, 2017
ORAL ARGUMENT REQUESTED

I, Sarah Warbelow, declare as follows:

1. Human Rights Campaign (“HRC”) is a 501(c)(3) nonprofit organization incorporated in the District of Columbia. HRC is the largest civil rights organization working to achieve equality for lesbian, gay, bisexual, transgender and queer (“LGBTQ”) Americans, and represents more than 3 million members and supporters nationwide. HRC’s core mission is to ensure that LGBTQ people have and retain basic equal rights, and can be open, honest, and safe at home, at work, and in the community. HRC’s work focuses on ending discrimination against LGBTQ people, including those who wish to serve their country through the military.

2. HRC’s members include transgender individuals currently serving in the United States military and transgender individuals who wish to serve in the United States military.

3. HRC sues on behalf of its individual members, including Ryan Karnoski, Staff

1 Sergeant Cathrine Schmid, both of whom are also plaintiffs in the present lawsuit, and other
2 prospective and current transgender service members who are currently adversely affected by the
3 ban on open service by transgender men and women in the military.

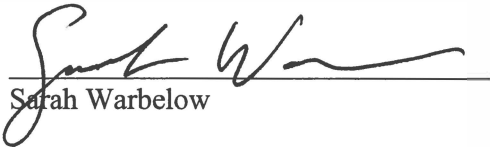
4 4. The interest that HRC seeks to protect – the right of all Americans, including
5 transgender individuals, to serve their country in the military, and to do so openly and without
6 discrimination – relates directly to HRC’s fundamental purpose and mission as stated above.
7 HRC has a strong interest in ensuring that Mr. Karnoski, Staff Sergeant Schmid, and all of its
8 members who are prospective and current transgender service members be permitted to pursue
9 this noble career path, and that they are not excluded simply based on their status as transgender.

10 5. I, Sarah Warbelow, serve as the Legal Director for HRC, and am authorized to
11 submit this declaration on its behalf.

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

DATED: September 13, 2017


Sarah Warbelow

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States of America and the laws of the State of Washington that on September 14, 2017, I caused true and correct copies of the foregoing documents to be served by the method(s) listed below on the following interested parties:

By Hand Delivery:

US Attorney’s Office
700 Stewart St., Suite 5220
Seattle, WA 98101-1271

By Registered or Certified Mail:

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Department of Defense
1400 Defense Pentagon
Washington, DC 20301-1400

Secretary of Defense James N. Mattis
1000 Defense Pentagon
Washington, DC 20301-1000

President Donald J. Trump
1600 Pennsylvania Ave. NW
Washington, DC 20500

I hereby certify under the penalty of perjury that the foregoing is true and correct. Executed on September 14, 2017 at Seattle, Washington.

s/Rachel Horvitz
Rachel Horvitz, *Paralegal*