

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

AUGUST DEKKER, *et al.*,

Plaintiffs,

v.

JASON WEIDA, *et al.*,

Defendants.

Case No.: 4:22-cv-00325-RH-MAF

DECLARATION OF MIRIAM GROSSMAN, MD

I, Miriam Grossman, MD, consistent with 28 U.S.C. § 1746, hereby state:

1. I am over the age of 18, am competent to testify, and declare the following facts based on my own personal knowledge.
2. I currently reside in the State of New York.
3. I am a psychiatrist licensed by the State of New York.
4. I have practiced medicine for over 30 years.
5. Through my practice I have developed expertise and opinions regarding the proper diagnosis and treatment of gender dysphoria.
6. I believe gender dysphoria is a matter of public interest and concern.
7. I have expressed my views on the subject in a variety of public fora.

8. I have written four books, two of which deal with sex and gender education and ideology.

9. On July 8, 2022, I appeared virtually on a panel of doctors in a public hearing held by the State of Florida Agency for Health Care Administration. I made no remarks, and I was not asked questions. I did not speak at any time during the hearing.

10. I do not know if the hearing was recorded.

11. If such a recording was made, I do not have one.

12. On January 5, 2023, I received an email from Soraya Garcia, a Practice Support Specialist at Pillsbury Winthrop Shaw Pittman LLP. The email attached a subpoena signed by Jennifer Altman, an attorney, and was addressed to “Mirian [sic] Grossman MD, 1917 Benecia Ave., Los Angeles, CA 90025” listing “Veritext Legal Solutions, 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017” as the place of production. The subpoena specified that I needed to produce the requested documents by 9:00 AM on January 20, 2023.

13. After I saw the email, I called Soraya Garcia, and she connected me with an attorney at the firm, Joe Little. I informed them that I no longer lived in California, and I had never lived at the address on the face of the subpoena attached to the e-mail.

14. On the evening of January 18, 2023, I was served at my residence in New York with a printed copy of the subpoena. This subpoena was also signed by Jennifer Altman, was still addressed to “Mirian [sic] Grossman MD, 1917 Benecia Ave., Los Angeles, CA 90025,” it still listed “Veritext Legal Solutions, 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017” as the place of production, and it still specified January 20, 2023, 9:00 AM as the date and time of production. In all respects, it appeared to be identical to the subpoena attached to the e-mail I had previously received.

15. On top of the printed copy of the subpoena was a check from PERILLO PROFESSIONAL SERVICES written out to Mirian [sic] Grossman MD in the amount of \$53.95.

16. On January 31, 2023, I was served again at my residence with a copy of the subpoena. This copy was also signed by Jennifer Altman, it was still addressed to “Mirian [sic] Grossman MD, 1917 Benecia Ave., Los Angeles, CA 90025,” it still listed “Veritext Legal Solutions, 707 Wilshire Boulevard, Suite 3500, Los Angeles, CA 90017” as the place of production, and it still specified January 20, 2023, 9:00 AM as the date and time of production. In all respects, it appeared to be identical to the subpoena attached to the e-mail I had previously received.

17. The subpoena demanded that I provide nearly a decade’s worth of my private information. It disturbed me deeply because I believe that Plaintiffs,

Pillsbury, the National Health Law Program, Florida Justice Project, Southern Legal Counsel, and Lambda Legal demanded this information from me as retribution for my virtual appearance on a panel of doctors during a public hearing and for offering my professional opinions and views.

18. I am especially disturbed at the nature of the information which the subpoena seeks, including deeply personal information about my personal political affiliations and donations; materials that appear completely irrelevant to the issues and outcome of this case.

19. The subpoena demanded that I produce almost a decade's worth of personal and other information. I have already spent over 5 hours attempting to begin the process of inventorying and compiling what they've demanded.

20. I can only imagine the burden that would be imposed if I were required to comply with the subpoena as currently written. The effort required would be overwhelming.

I say nothing further.

On February 3, 2023, pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury the foregoing is true and correct.

/s/ *Miriam Grossman*
Miriam Grossman, MD