

May 1, 2023

Sent Via Email at Johnathan.Stone@oag.texas.gov, Heather.Dyer@oag.texas.gov

Johnathan Stone
Heather Dyer
Office of the Texas Attorney General
P.O. Box 12548
Austin, Texas 78711-2548

RE: Rule 11 Agreement and Informal Stay of Trial Court Proceedings in *PFLAG, Inc., et al. v. Abbott, et al.*, D-1-GN-22-0002569, In the 459th District Court, Travis County

Dear Johnathan and Heather:

This letter memorializes the following Rule 11 agreement between all Plaintiffs and their counsel of record in this cause, Defendant the Texas Department of Family and Protective Services (“DFPS”), Defendant DFPS Commissioner Stephanie Muth (the “Commissioner”)¹ and all of Defendants’ counsel of record in this cause²:

- 1. First Amended Agreed Level 3 Scheduling Order Preempted:** All settings, deadlines, and the October 23, 2023 trial date in the First Amended Agreed Level 3 Scheduling Order, signed and entered February 14, 2023, and all deadlines in the Rule 11 Agreement entered April 10, 2023 are lifted.³ The limitations on time for oral depositions and number of interrogatories remain in effect.
- 2. Informal Stay of Trial Court Proceedings:** The Parties and their counsel agree they will not seek an order to stay this cause from the trial court, unless and until this Rule 11 agreement is terminated in accordance with Term 4 below. The Parties agree they will not file any substantive motions, notices, pleadings or other documents with the trial court, serve any additional discovery requests, make demands for responses to outstanding discovery requests, serve any deposition notices (on each other, other parties to the suit or nonparties), serve any discovery

¹ Jamie Masters was the Commissioner of the DFPS at the time this suit was filed and was named as a Defendant in her official capacity. Masters has since been replaced in the role of DFPS Commissioner by Stephanie Muth, who, in her official capacity, is now the appropriate Defendant.

² Plaintiffs and Defendants DFPS and the Commissioner shall collectively be referred to as the “Parties” herein.

³ This Rule 11 agreement shall not affect any hearing or correspondence with the Court regarding Plaintiffs’ Motion for Entry of a Confidentiality and Protective Order.





on nonparties, or otherwise proceed with the development of the case in the trial court, and all counsel agree they will not take any such actions on behalf of the Parties to this agreement or any other party to the suit. This does not preclude the Parties or counsel from filing notices of appearances, changes of counsel, *pro hac vice* motions, status reports or other filings that do not require responses from the Parties, other parties to the suit or nonparties, and do not implicate either directly or indirectly the substance of the dispute, particularly for the purpose of avoiding dismissal for want of prosecution. However, the Parties and their counsel may notify the trial court that deadlines have been lifted and settings have been passed, or urge the trial court to rule on motions it has already heard. This informal stay of the trial court proceedings does not apply to or affect any proceedings in any appellate court or the Texas Supreme Court.

3. **Stay of Investigations:** During the pendency of this Rule 11 agreement, Defendants DFPS and the Commissioner will comply with the July 8, 2022 and September 16, 2022 injunctions in this cause, attached hereto as Exhibits A and B.

4. **Duration/Termination:** This Rule 11 agreement shall remain in effect until:
 - a. all Parties through their counsel of record agree in writing that this Rule 11 agreement is terminated; or
 - b. fourteen days after a Party provides written notice to the opposing Parties that it intends to terminate this agreement; or
 - c. a court orders the termination of this agreement; or
 - d. both:
 - i. a final opinion has been issued in the appeal in Case No. 03-22-00587-CV (into which Case No. 03-22-00420 has been consolidated) in the Third Court of Appeals and any associated proceedings in the Texas Supreme Court that may occur, and
 - ii. the trial court has ruled on Defendants' Plea to the Jurisdiction.

5. **Breach and Enforcement:** If any Party believes another Party has materially breached this agreement and the Parties are unable to remedy the breach, the nonbreaching Party may ask the Court to enforce this agreement or seek sanctions from the trial court as appropriate.

6. **Court Orders:** Nothing in this Rule 11 agreement supersedes any relief, including but not limited to temporary injunctive relief, that has been or may be granted in




this lawsuit or any appeals therefrom by the trial court, the Third Court of Appeals, the Texas Supreme Court, or any other court. The termination of this agreement shall have no impact on the validity or enforceability of any court order entered in this lawsuit or any appeal therefrom.

If this letter accurately reflects the terms of our Rule 11 agreement, please sign below.


Very truly yours,

LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.

 Agreed: May 3, 2023

Shelly L. Skeen
Senior Attorney
Pronouns: she/her/hers

AGREED:


Johnathan Stone/Heather Dyer
Attorneys for Defendants
Date: May 3, 2023

PFLAG, INC.; MIRABEL VOE, individually
and as parent and next friend of ANTONIO
VOE, a minor; WANDA ROE, individually and
as parent and next friend of TOMMY ROE, a
minor; ADAM BRIGGLE and AMBER
BRIGGLE, individually and as parents and next
friends of M.B., a minor,

Plaintiffs,

v.

GREG ABBOTT, sued in his official capacity as
Governor of the State of Texas; JAIME
MASTERS, sued in her official capacity as
Commissioner of the Texas Department of
Family and Protective Services; and the TEXAS
DEPARTMENT OF FAMILY AND
PROTECTIVE SERVICES

Defendants.

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IN THE DISTRICT COURT OF
TRAVIS COUNTY, TEXAS
459th JUDICIAL DISTRICT

**ORDER GRANTING PLAINTIFFS VOES' AND ROES'
APPLICATIONS FOR TEMPORARY INJUNCTION AGAINST JAMIE MASTERS, IN
HER OFFICIAL CAPACITY AS THE COMISSIONER OF THE TEXAS
DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES,
AND THE TEXAS DEPARTMENT OF FAMILY AND PROTECTIVE SERVICES**

On July 6, 2022, the Court considered the application by Plaintiffs PFLAG, Inc. (“PFLAG”); Mirabel Voe, individually and as parent and next friend of Antonio Voe, a minor; Wanda Roe, individually and as parent and next friend of Tommy Roe; and, Adam Briggle and Amber Briggle, individually and as parents and next friends of M.B., a minor, (collectively, “Plaintiffs”) for a Temporary Injunction (the “Application”), as found in Plaintiffs’ Original Petition, Application for Temporary Restraining Order, Temporary and Permanent Injunction, and Request for



Declaratory Relief (“Petition”) filed against Defendants Greg Abbott, in his official capacity as Governor of the State of Texas; Jaime Masters, in her official capacity as Commissioner of the Texas Department of Family and Protective Services (“Commissioner Masters”); and the Texas Department of Family and Protective Services (“DFPS”) (collectively, “Defendants”).

Based on the facts set forth in Plaintiffs’ Petition, the declarations attached thereto, the testimony, the evidence, and the argument of counsel presented during the July 6, 2022, hearing on Plaintiffs’ Application, this Court finds sufficient cause to enter a Temporary Injunction against Commissioner Masters and DFPS on behalf of MIRABEL VOE, individually and as parent and next friend of ANTONIO VOE, a minor and WANDA ROE, individually and as parent and next friend of TOMMY ROE, a minor. The applications for Temporary Injunction on behalf of PFLAG, Inc. and ADAM BRIGGLE and AMBER BRIGGLE, individually and as parents and next friends of M.B., a minor, remain under advisement by the Court and no ruling is issued in this Order.

Plaintiffs VOE and ROE state a valid cause of action against Commissioner Masters and DFPS and have a probable right to the declaratory and permanent injunctive relief they seek. For the reasons detailed in Plaintiffs’ Application and accompanying evidence, there is a substantial likelihood that Plaintiffs will prevail after a trial on the merits. Commissioner Masters and DFPS implemented a new rule expanding the definition of “child abuse” to presumptively treat the provision of gender-affirming medical care, including puberty blockers and hormone therapy, as necessitating an investigation (“DFPS Rule”). The DFPS Rule operationalized Governor Abbott’s February 22, 2022, letter to Commissioner Masters (“Governor Abbott’s Directive”) and Attorney General Paxton’s Opinion No. KP-0401 (“Attorney General Paxton’s Opinion”), which DFPS announced in its statement on February 22, 2022. The DFPS Rule was adopted without following

the necessary procedures under the APA, is contrary to DFPS's enabling statute, is beyond the authority provided to the Commissioner and DFPS, and is otherwise contrary to law, as alleged in Plaintiffs' Petition.

The Court further finds that an allegation about the provision of gender-affirming medical care, such as puberty blockers and hormone therapy, without more, was not investigated as child abuse by DFPS until after February 22, 2022. The DFPS Rule changed the *status quo* for transgender children and their families. The DFPS Rule was given the effect of a new law or new agency rule, despite no new legislation, regulation, or even valid agency policy.

It clearly appears to the Court that unless Commissioner Masters and DFPS are immediately enjoined from enforcing the DFPS Rule operationalizing Governor Abbott's Directive and Attorney General Paxton's Opinion, against the VOE and ROE Plaintiffs, who will suffer probable, imminent, and irreparable injury in the interim. Such injury, which cannot be remedied by an award of damages or other adequate remedy at law, includes, but is not limited to: being subjected to an unlawful and unwarranted child abuse investigation; intrusion and interference with parental decision-making; the deprivation or disruption of medically necessary care for the parents' adolescent children; the chilling of the exercise of the right of Texas parents to make medical decisions for their children relying upon the advice and recommendation of their health care providers acting consistent with prevailing medical guidelines; intrusion into the relationship between patients and their health care providers; gross invasions of privacy in the home and school, and the resulting trauma felt by parents, siblings, and other household members; outing an adolescent as transgender; adverse effects on grades and participation in school activities; fear and anxiety associated with the threat of having a child removed from the home; increased incidence of depression and risk of self-harm or suicide; having to uproot their lives and

their families to seek medically necessary care in another state; being placed on the child abuse registry and the consequences that result therefrom; and criminal prosecution and the threat thereof.

The Temporary Injunction being entered by the Court today maintains the status quo prior to February 22, 2022, and should remain in effect until final trial. The PFLAG and BRIGGLE Plaintiffs' Applications for Temporary Relief remain pending before this Court, and the Court will rule as soon as possible after it has had adequate time to consider legal and factual consideration of the record before it.

IT IS THEREFORE ORDERED that, until all issues in this lawsuit are finally and fully determined, Defendants Commissioner Masters and DFPS *are immediately enjoined and restrained from* implementing or enforcing the DFPS Rule, and from implementing Governor Abbott's Directive and the Attorney General's Opinion in the following manners:

(1) investigating MIRABEL VOE or WANDA ROE, individually or as next friends of ANTONIO VOE or TOMMY ROE, for possible child abuse or neglect *solely* based on allegations that they have a minor child or are a minor child who is gender transitioning or alleged to be receiving or being prescribed medical treatment for gender dysphoria, and

(2) taking any actions, including investigatory or adverse actions, against Plaintiffs VOE and ROE and their minor children, with open investigations solely based on allegations that they have a child who is transgender, gender nonconforming, gender transitioning, or receiving or being prescribed medical treatment for gender dysphoria, except that DFPS shall have the ability to administratively close or issue a "ruled out" disposition in any of these open investigations based on the information DFPS has to date – if this action requires no additional contact with members of the VOE or ROE families.

IT IS FURTHER ORDERED that a trial on the merits of this case is preferentially set before the Honorable Amy Clark Meachum, Judge of the 201st Judicial District Court of Travis County, Texas, on December 5, 2022, at 9 a.m. in the courtroom of the 201st Judicial District of Travis County, Texas, or in the 201st District Court Virtual/Zoom courtroom under the Texas Supreme Court Emergency Orders related to COVID-19. The Clerk of the Court is hereby directed to issue a show cause notice to Defendants to appear at the trial.

The Clerk of the Court shall forthwith issue a temporary injunction in conformity with the laws and terms of this Order.

Plaintiffs have previously executed with the Clerk a bond in conformity with the law in the amount of \$100 dollars, and that bond amount will remain adequate and effective for this Temporary Injunction.

IT IS FURTHER ORDERED that this Order shall not expire until judgment in this case is entered or this Case is otherwise dismissed by the Court.

Signed on July 8, 2022, at 4:55 p.m. in Travis County, Texas.



JUDGE AMY CLARK MEACHUM

Commissioner of the Texas Department of Family and Protective Services (“Commissioner Masters”); and the Texas Department of Family and Protective Services (“DFPS”) (collectively, “Defendants”).

Based on the facts set forth in Plaintiffs’ Petition, the declarations attached thereto, the testimony, the evidence, and the argument of counsel presented during the July 6, 2022 hearing on Plaintiffs’ Application, this Court previously found sufficient cause to enter a Temporary Injunction against Commissioner Masters and DFPS on behalf of the Voe and Roe Plaintiffs.

During the last two months, the Court has considered the associational standing of PFLAG, as well as the ripeness of the Briggles’ claims. Having now considered the applicable law, as well as the testimony, the evidence, and the arguments and briefing of counsel, this Court finds that PFLAG has standing, and the Briggles Plaintiffs’ claims are ripe, in order to pursue this matter to final trial. The Court further finds sufficient cause to enter a Temporary Injunction against Commissioner Masters and DFPS on behalf of PFLAG and the Briggles Plaintiffs.

All Plaintiffs state a valid cause of action against Commissioner Masters and DFPS and have a probable right to the declaratory and permanent injunctive relief they seek. For the reasons detailed in Plaintiffs’ Application and accompanying evidence, there is a substantial likelihood that Plaintiffs will prevail after a trial on the merits. Commissioner Masters and DFPS implemented a new rule expanding the definition of “child abuse” to presumptively treat the provision of gender-affirming medical care, including puberty blockers and hormone therapy, as necessitating an investigation (“DFPS Rule”). The DFPS Rule operationalized Governor Abbott’s February 22, 2022, letter to Commissioner Masters (“Governor Abbott’s Directive”) and Attorney General Paxton’s Opinion No. KP-0401 (“Attorney General Paxton’s Opinion”), which DFPS announced in its statement on February 22, 2022. The DFPS Rule was adopted without following

the necessary procedures under the APA, is contrary to DFPS's enabling statute, is beyond the authority provided to the Commissioner and DFPS, and is otherwise contrary to law, as alleged in Plaintiffs' Petition.

The Court finds this new rule was improperly promulgated by Defendants and interferes with or impairs – or threatens to interfere with or impair – the legal rights and privileges of PFLAG members and their families, as well as the legal rights and privileges of the Briggie Plaintiffs, as well as the other Plaintiffs in this case. *See* Tex. Gov't Code sec. 2001.038(a).

The Court further finds that an allegation about the provision of gender-affirming medical care, such as puberty blockers and hormone therapy, without more, was not investigated as child abuse by DFPS until after February 22, 2022. The DFPS Rule changed the *status quo* for transgender children and their families. The DFPS Rule was given the effect of a new law or new agency rule, despite no new legislation, regulation, or even valid agency policy.

It clearly appears to the Court that unless Commissioner Masters and DFPS are immediately enjoined from enforcing the DFPS Rule operationalizing Governor Abbott's Directive and Attorney General Paxton's Opinion, members of Plaintiff PFLAG, including the Voe, Roe, and Briggie families (collectively, "Plaintiff Families"), will suffer probable, imminent, and irreparable injury in the interim. Such injury, which cannot be remedied by an award of damages or other adequate remedy at law, includes, but is not limited to: being subjected to an unlawful and unwarranted child abuse investigation; intrusion and interference with parental decision-making; the deprivation or disruption of medically necessary care for the parents' adolescent children; the chilling of the exercise of the right of Texas parents to make medical decisions for their children relying upon the advice and recommendation of their health care providers acting consistent with prevailing medical guidelines; intrusion into the relationship

between patients and their health care providers; gross invasions of privacy in the home and school, and the resulting trauma felt by parents, siblings, and other household members; outing an adolescent as transgender; adverse effects on grades and participation in school activities; fear and anxiety associated with the threat of having a child removed from the home; increased incidence of depression and risk of self-harm or suicide; having to uproot their lives and their families to seek medically necessary care in another state; being placed on the child abuse registry and the consequences that result therefrom; and criminal prosecution and the threat thereof.

The Temporary Injunction being entered by the Court today maintains the status quo prior to February 22, 2022, and should remain in effect while this Court, and potentially the Court of Appeals, and the Supreme Court of Texas, examine the parties' merits and jurisdictional arguments.

IT IS THEREFORE ORDERED that, until all issues in this lawsuit are finally and fully determined, Defendants Commissioner Masters and DFPS are immediately enjoined and restrained from implementing or enforcing the DFPS Rule, and from implementing Governor Abbott's Directive and the Attorney General's Opinion, with regard to members of Plaintiff PFLAG, including but not limited to Plaintiff Families, and that such restraint encompasses but is not limited to:

(1) investigating members of PFLAG, including but not limited to Plaintiff Families, for possible child abuse or neglect *solely* based on allegations that they have a minor child who is gender transitioning or alleged to be receiving or being prescribed medical treatment for gender dysphoria, and

(2) taking any actions, including investigatory or adverse actions, against Plaintiff Families and other members of PFLAG with open investigations solely based on allegations that they have

a child who is transgender, gender nonconforming, gender transitioning, or receiving or being prescribed medical treatment for gender dysphoria, except that DFPS shall have the ability to administratively close or issue a “ruled out” disposition in any of these open investigations based on the information DFPS has to date.

IT IS FURTHER ORDERED that in furtherance of the above, Defendants Commissioner Masters, DFPS and its employees, agents, contractors, and attorneys, as well as any individuals or entities in active concert with them, directly or indirectly under their control, or participating with them, who receive actual notice of the Order by personal service or otherwise, and who also receive actual notice that the person(s) reported for suspected child abuse or neglect solely based on allegations that the person(s) have a minor child who is gender transitioning, or receiving or being prescribed gender-affirming medical treatment, including puberty blockers and/or hormone therapy, is a member of Plaintiff PFLAG, shall immediately cease any intake, investigation, or assessment, including ceasing any further contact, communications, or other action related to processing such allegations. As specified above, DFPS shall have the ability to administratively close or issue a “ruled out” disposition in any of these open investigations based on the information DFPS has to date.

IT IS FURTHER ORDERED that a trial on the merits of this case is preferentially set before the Honorable Amy Clark Meachum, Judge of the 201st Judicial District Court of Travis County, Texas on June 12, 2023, at 9:00 a.m. o’clock in the courtroom of the 201st Judicial District of Travis County, Texas. The Clerk of the Court is hereby directed to issue a show cause notice to Defendants to appear at the trial.

The Clerk of the Court shall forthwith issue a temporary injunction in conformity with the laws and terms of this Order.

Plaintiffs have previously executed with the Clerk a bond in conformity with the law in the amount of \$100 dollars, and that bond amount will remain adequate and effective for this Temporary Injunction.

IT IS FURTHER ORDERED that this Order shall not expire until judgment in this case is entered or this Case is otherwise dismissed by the Court.

Signed on September 16th, 2022, at 3:00 p.m. in Travis County, Texas.



JUDGE AMY CLARK MEACHUM

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Shelly Skeen

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Envelope ID: 75286123

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Filing Description: LETTER REGARDING RULE 11 AGREEMENT

Status as of 5/4/2023 2:42 PM CST

Associated Case Party: ADAM BRIGGLE

Name	BarNumber	Email	TimestampSubmitted	Status
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Associated Case Party: GREG ABBOTT THE GOVERNOR OF THE STATE OF TEXAS

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Associated Case Party: PFLAGI NC

Name	BarNumber	Email	TimestampSubmitted	Status
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