

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

AMERICAN ACADEMY OF PEDIATRICS, *et al.*,

*Plaintiffs,*

vs.

ROBERT F. KENNEDY, JR., in his official  
capacity as Secretary of the Department of Health  
and Human Services, *et al.*,

*Defendants.*

Case No. 1-25-cv-11916

**INDIVIDUAL PLAINTIFF’S MOTION TO PROCEED UNDER PSEUDONYM AND  
FOR PROTECTIVE ORDER**

The Individual Plaintiff, a pregnant physician who seeks a COVID-19 vaccine to protect herself and her innocent unborn child despite the directive of the Secretary of the Department of Health and Human Services’s (“Secretary”) rescinding the recommendation that healthy pregnant individuals routinely get vaccinated against Covid-19 (the “Secretarial Directive”) , brings this motion seeking leave to participate as a plaintiff in the above-captioned action under a pseudonym.

For the reasons explained in the accompanying memorandum of law, the Individual Plaintiff’s circumstances warrant proceeding pseudonymously and therefore, Individual Plaintiff respectfully asks the Court to (1) grant her motion to proceed under the pseudonym “Jane Doe, M.D.” and referring to her baby as “Baby Doe”; (2) enter a protective order prohibiting any defendant from disclosing Plaintiff’s identity or the identity of her baby unless such disclosure is necessary to defend against this action; (3) order all unsealed public filings shall refer to the Individual Plaintiff as “Jane Doe, M.D.” and her baby as “Baby Doe” and that the filing party shall redact all personal identifiers and information about her that would, alone or with other disclosed

information, reveal her identity or the identity of her baby in accordance with Federal Rule of Civil Procedure 5.2; and (4) order that any nonparty who is informed of the Individual Plaintiff's identity or the identity of her baby shall be bound by the Court's order and shall receive a copy of the same.

Counsel for Individual Plaintiff will attempt to contact counsel for Defendant to ascertain the position of counsel for Defendants on Individual Plaintiff's Motion to Proceed Under Pseudonym and for Protective Order.

A copy of the Complaint bearing Individual Plaintiff's legal name will be provided to the Court under seal contemporaneously with this Motion. If the Court grants Individual Plaintiff's Motion, Individual Plaintiff will serve a copy of the Complaint bearing the Individual Plaintiff's full legal name on Defendants subject to the Court's protective order.

Dated: July 7, 2025

Respectfully submitted,

By: /s/ Elizabeth J. McEvoy (BBO No. 683191)  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document was filed through the ECF system and served upon the following parties by Process Server on this 7th day of July 2025:

Robert F. Kennedy, Jr., in his official capacity  
as Secretary of Health and Human Services

Marty Makary, in his official capacity as  
Commissioner of the Food and Drug  
Administration

Jay Bhattacharya, in his official capacity as  
Director of the National Institutes of Health

Matthew Buzzelli, in her official capacity as  
Acting Director Centers for Disease Control  
and Prevention

c/o Leah Belaire Foley, US Attorney  
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