

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In Re Administrative Subpoena No. 25-1431-014

Civil Action No. \_\_\_\_\_

**MOTION TO QUASH SUBPOENA DUCES TECUM**

1. On June 12, 2025, Subpoena No. 25-1431-014 (“Subpoena”) was issued by Requester, the United States of America Department of Justice (“Requester”), upon Respondent, Children’s Hospital of Philadelphia (“Respondent” or “Children’s Hospital”), pursuant to 18 U.S.C. § 3486.<sup>1</sup>

2. Movants are patients and former patients who received gender-affirming care from Children’s Hospital, along with their parents. The Subpoena seeks Movants’ identities and medical records and the intimate personal details therein. In requesting such records, the Subpoena violates the privacy rights of patients and their parents. The Requester also issued the Subpoena for an improper purpose.

3. Movants hereby move this Court for an order quashing requests for patient records demanded in the Subpoena, more specifically identified below. Movant seeks to quash the Subpoena as to the following requests:

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<sup>1</sup> See *In Re: Subpoena No. 25-1431-014*, 2:25-mc-00039 (E.D. Pa. July 8, 2025), Dkt. No. 1.

- a. Request 11: “Documents sufficient to identify each patient (by name, date of birth, social security number, address, and parent/guardian information) who was prescribed puberty blockers or hormone therapy.”
- b. Request 12: “For each such patient identified in Subpoena [Request 11], documents relating to the clinical indications, diagnoses, or assessments that formed the basis for prescribing puberty blockers or hormone therapy.”
- c. Request 13: “All documents relating to informed consent, patient intake, and parent or guardian authorization for minor patients identified in [Request 11], including any disclosures about off-label use (i.e., uses not approved by the United States Food and Drug Administration) and potential risks.”
- d. Any and all other Requests enumerated in the Subpoena (Request 1 through Request 15) to the extent that such Requests or sub-Requests call for the production of the identities or health information of patients and their parents.

4. In support of their Motion, Movants incorporate an accompanying memorandum of law and declarations.

5. Counsel for Movants and Counsel for the United States conferred via videoconference on September 19, 2025. Counsel for the United States stated they would oppose the motion on any number of grounds, including standing, jurisdiction, and timeliness.

**WHEREFORE**, Movants respectfully request that this Court quash the Subpoena as requested in this motion.

Dated: September 22, 2025

By: /s/ Jill Steinberg  
Jill Steinberg  
J. Chesley Burruss  
Kevin M. Hayne\*  
Elizabeth A. Lilly  
BALLARD SPAHR LLP  
1735 Market Street, 51st Floor  
Philadelphia, PA 19103  
215-665-8500  
steinbergj@ballardspahr.com  
burrussc@ballardspahr.com  
haynek@ballardspahr.com  
lillye@ballardspahr.com

Respectfully submitted,

By: /s/ Daniel Urevick-Ackelsberg  
Mary M. McKenzie  
Daniel Urevick-Ackelsberg  
Meghan Binford  
Olivia Mania  
PUBLIC INTEREST LAW CENTER  
2 Penn Center  
1500 JFK Blvd., Suite 802  
Philadelphia, PA 19102  
267-546-1316  
mmckenzie@pubintl.org  
dackelsberg@pubintl.org  
mbinford@pubintl.org  
omania@pubintl.org

*Counsel for Movants*  
*\*Pro hac vice forthcoming*