

PRELIMINARY STATEMENT

B. Defendants

1. State Defendants

Id.

2. School Board Defendants

FACTUAL ALLEGATIONS

A. HB 1069 (2023)

mix mux

C. Defendants' Implementation and Enforcement of Subsection 3

1.

see

See

See

See

See id.

a. Defendant Hillsborough County School Board

See

b. Defendant Lee County School Board

3. Defendant Florida Virtual School Board of Trustees

See

D. Gender Identity and the Harms of Misgendering

E. Subsection 3's Effects on Plaintiffs

1. Effects on Ms. Wood

2. Effects on Ms. Doe

3. Effects on Mx. Schwandes

mux

CLAIMS FOR RELIEF

COUNT 1

Violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2

Discrimination Because of Sex

et seq.

COUNT 2

Preemption by Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-7

COUNT 3

Violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2

Discrimination Because of Sex

COUNT 5

Violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2

Discrimination Because of Sex

COUNT 6

Violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2

Discharge Because of Sex

COUNT 7

Violation of the First and Fourteenth Amendments to the U.S. Constitution

Deprivation of Freedom of Speech

COUNT 8

Violation of the First and Fourteenth Amendments to the U.S. Constitution

Deprivation of Freedom of Speech

COUNT 9

Violation of the First and Fourteenth Amendments to the U.S. Constitution

Deprivation of Freedom of Speech

COUNT 10

Violation of the Fourteenth Amendment to the U.S. Constitution

Deprivation of Equal Protection of the Laws

post hoc

COUNT 11

Violation of the Fourteenth Amendment to the U.S. Constitution

Deprivation of Equal Protection of the Laws

post hoc

COUNT 12

Violation of the Fourteenth Amendment to the U.S. Constitution

Deprivation of Equal Protection of the Laws

post hoc

COUNT 13

**Violation of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681
*et seq.***

Discrimination on the Basis of Sex

et

seq.

COUNT 14

Violation of Title IX of the Educat

COUNT 15

**Violation of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681
*et seq.***

Discrimination on the Basis of Sex

COUNT 16

**Violation of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681
*et seq.***

JURY DEMAND

Not admitted to practice law in DC

Admission to GA pending

Counsel for Plaintiffs

motion forthcoming