

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

TAMER MAHMOUD, et al.,

*Plaintiffs,*

v.

MONIFA B. MCKNIGHT, in her official  
capacity as Superintendent of the  
Montgomery Board of Education, et al.,

*Defendants.*

Case No. 8:23-CV-01380-TJS

**DECLARATION OF  
GRACE MORRISON IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR A PRELIMINARY  
INJUNCTION**

I, Grace Morrison, declare as follows:

1. My name is Grace Morrison. I am over 21 years old and capable of making this declaration pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this declaration.
2. I am a board member of Kids First, the Plaintiff unincorporated association of parents and teachers formed to advocate for the return of parental notice and opt-out rights in the Montgomery County Public Schools.
3. My husband and I reside in Montgomery County, Maryland. Our youngest child was adopted as an infant from Ukraine. She is now 10 years old and has Down Syndrome and Attention Deficit Disorder. She has been in the Montgomery County Schools since she was 3 years old. She is currently enrolled in the Learning for Independence Program in a Montgomery County Public School. She has an IEP and her advanced needs qualify her for a full time, one-on-one paraeducator. She also receives special services in the school such as speech therapy and occupational therapy.
4. My husband and I adhere to the Roman Catholic faith, including the Church's teachings on marriage, family, sex, sexuality, and gender.

5. As the Catholic Church teaches, we believe that marriage is the lifelong union of one man and one woman—distinct from each other, while complementary to each other—and that the nature and purpose of human sexuality is fulfilled in that union. For these same reasons, we live and teach the Church’s teachings to our children about gender, which we believe is interwoven with one’s sex, sexuality, and the ordering of the male and female bodies.

6. While—as we know first-hand from our adoption experience—not every child is raised with a mother and a father, every child is created by a mom and dad. We believe this is the result of God’s ordering of the human species. Our faith motivated us to adopt our youngest daughter, to provide her a loving mother and father, and to raise her in our Catholic faith—just as we have our biological children.

7. Among other requirements, our sacred obligation as parents compels us to form our daughter’s understanding of what it means to be a woman, to love another person, the nature and purpose of marriage, and how to embrace the vocation she is called to by God.

8. Our religious obligations as our youngest daughter’s parents are pressured by the “Pride” literature. In addition to conflicting with our religious understandings of marriage, sexuality, and gender, it is practically impossible for us to contradict that instruction.

9. Due to her learning challenges, she doesn’t understand or differentiate instructions from her teachers and her parents. In fact, at ten years old, we only recently helped her understand the need to use the girl’s restroom. My husband and I won’t be able to contradict what she hears from teachers. Due to her learning challenges, she will not be able to understand how or why we disagree.

10. Moreover, because of her needs we do not have a clear alternative for her education except to remain in the public schools. Even if we could afford private education, none of the private school options we are aware of would be able to keep

her instruction at her developmental level, even with those school's best efforts and intentions. She would still need to go outside any private school for occupational therapy and speech therapy. Only the public school system has all those resources.

11. Because of this pressure, I asked my daughter's teacher via email if her class would be reading any of the "Pride" literature on May 31, 2023. Had I not asked, I would not have known.

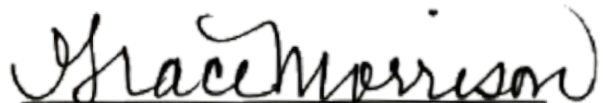
12. My daughter's teacher told me that the literature would be presented by the librarian on June 2, and by her teacher on June 5 and 6 in the language arts class. I inquired about an opt out, and her teacher said that no opt out was possible. Subsequently, I emailed my daughter's principal to inquire more about the literature. I was told that they adhere to the MCPS policy. I responded that we would not have our daughter attend school at that time, and we kept her home.

13. Consequently, the School Board's decision to disallow opt outs from the Pride Storybooks directly and significantly burdens the religious obligation of me and my husband to instruct our youngest child in accordance with the Catholic faith.

14. By not allowing an opt out, my husband and I are forced to place our daughter in a school where she will be taught views on marriage, sexuality, and gender that will be practically impossible for us to contradict. We have no other realistic choice but public school.

15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this 11th day of August, 2023.

  
Grace Morrison