

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

DR. JAMES L. SHERLEY; DR. THERESA
DEISHER; NIGHTLIGHT CHRISTIAN
ADOPTIONS, individually and as next friend for
PLAINTIFF EMBRYOS; SHAYNE AND TINA
NELSON; WILLIAM AND PATRICIA FLYNN;
CHRISTIAN MEDICAL ASSOCIATION,

Plaintiffs,

v.

Civil Action No. _____

KATHLEEN SEBELIUS, in her official capacity as
Secretary of the Department of Health and Human
Services; DEPARTMENT OF HEALTH AND
HUMAN SERVICES; DR. FRANCIS S. COLLINS, in
his official capacity as Director of the National
Institutes of Health; NATIONAL INSTITUTES OF
HEALTH,

Defendants

DECLARATION OF WILLIAM T. FLYNN

I, Mr. William T. Flynn, declare as follows:

1. I am a plaintiff in this action, and I am a resident of the State of Massachusetts. I am over the age of eighteen and competent to testify. I am knowledgeable about the facts set forth herein and make this declaration in support of Plaintiffs' Motion for Preliminary Injunction.
2. In 2005, my wife and I began seeking to adopt an embryo, and became clients of Nightlight Christian Adoptions ("Nightlight"). Three years later, on April 5, 2008, our son—an embryo adopted through Nightlight—was born.
3. We have been seeking to adopt another embryo since May 28, 2009.

4. The National Institutes of Health Guidelines for Human Stem Cell Research will reduce the number of embryos available for adoption, which may make it more difficult for my wife and me to adopt an embryo.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 13, 2009.



Mr. William T. Flynn