

Cause No. 493-08026-2024

THE STATE OF TEXAS, <i>Plaintiff,</i>	§	IN THE DISTRICT COURT OF
	§	
v.	§	COLLIN COUNTY, TEXAS
	§	
M. BRETT COOPER, M.D., <i>Defendant.</i>	§	493 RD JUDICIAL DISTRICT
	§	

RULE 11 AGREEMENT¹

Plaintiff, the State of Texas, and Defendant, M. Brett Cooper, M.D., agree to the following terms pursuant to Tex. R. Civ. P. 11:

- Cooper shall not engage in the practice of medicine on patients, as defined by Tex. Occ. Code § 151.002(a)(13) and is restricted to practicing medicine in research, administrative, and academic settings;
- Cooper shall not prescribe supraphysiologic doses of testosterone or estrogen to minors for the purposes of transitioning a child’s biological sex or affirming a child’s belief that their gender identity is inconsistent with their biological sex;
- Cooper shall not treat, write prescriptions, or bill for treatments that are for the purposes of transitioning a minor’s biological sex or affirming their belief that their gender identity is inconsistent with their biological sex using false diagnoses or billing codes;
- The parties agree that the Court should vacate the hearing for **Texas’s Application for a Temporary Injunction**;
- Texas shall withdraw its **Request for an Expedited Discovery Scheduling Order**;
- This Rule 11 Agreement shall remain in effect until:
 - Superseded by another Court Order; or
 - Terminated by either or both of the parties.
- The Rule 11 Agreement may be terminated in the following manner:

¹ The parties agree that Cooper has not waived his argument that venue is improper in Collin County by entering this agreement.

- Both parties may agree to terminate the Rule 11 Agreement, whereby termination and release from the terms shall occur immediately upon filing written notification with the Court that the Rule 11 Agreement is terminated by agreement.
- The parties may unilaterally terminate the Rule 11 Agreement without agreement if either party provides written notification to the other party and files written notification with the Court withdrawing from the Rule 11 Agreement, whereupon:
 - Cooper shall remain subject to the terms of the Rule 11 Agreement for a period of 21-days after the Court is notified; and
 - Texas shall immediately be released from the terms of the Rule 11 Agreement after the Court is notified and may set a hearing for **Texas's Application for a Temporary Injunction** not sooner than 14 days after the Court is notified.

Dated: January 10, 2025

/s/ Johnathan Stone
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**ATTORNEYS FOR THE
STATE OF TEXAS**

Dated: January 10, 2025

Respectfully submitted,

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**Attorneys for Defendant
M. Brett Cooper, M.D.**

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2025, a copy of the foregoing document was served to all counsel of record in accordance with the Texas Rules of Civil Procedure.

/s/ Johnathan Stone
JOHNATHAN STONE
Chief for Consumer Protection Division

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Emily Samuels on behalf of Johnathan Stone
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Envelope ID: 96070789
Filing Code Description: Rule 11 Agreement
Filing Description:
Status as of 1/13/2025 8:30 AM CST

Associated Case Party: MBrettCooper

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