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THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

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DYLAN BRANDT, by and through his
Mother, JOANNA BRANDT, et al.,
Plaintiffs

V. CASE NO. 4:21-CV-00450-JM
LESLIE RUTLEDGE, et al.,
Defendants.

-----x

REMOTE/ORAL/WEB VIDEOCONFERENCE
VIDEOTAPED DEPOSITION OF
PAUL W. HRUZ, M.D., Ph.D.
May 25, 2022
9:00 a.m. CT

Reported by:
Maureen Ratto, RPR, CCR

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Videotape deposition of Paul W.
Hruz, M.D., Ph.D., held virtually via
Zoom Teleconference, hosted from
Veritext Legal Solutions, pursuant to
notice, before Maureen Ratto, Certified
Court Reporter, License No. XI01165,
Registered Professional Reporter,
License No. 817125, and Notary Public.

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21 ALSO PRESENT:

22 MICHAEL TSCHIEMER, Legal Video

23 Specialist

24

25

1 PAUL W. HRUZ, M.D., Ph.D.

2 Q. What does it mean to be
3 "consonant with the magisterium of the
4 Catholic Church?"

5 MS. LAND: Object to form.

6 A. Again, I want to be clear in
7 serving as an expert in this case that I
8 am a physician-scientist and pediatric
9 endocrinologist, not a theologian. But
10 what it means is that there are teachings
11 of the church that -- that the teaching
12 authority of the church put forward.

13 Q. Is your article consonant with
14 the magisterium of the Catholic church?

15 MS. LAND: Object to form.

16 A. Again, I'm not opining as a
17 theologian. I have no reason to doubt
18 that it is. But even if it were not,
19 based upon the paragraph that you read
20 and the publication criteria, it would
21 have still allowed it to be for
22 publication in this journal.

23 Q. Going back to your article,
24 which is marked as Exhibit 3, and this is
25 in abstract. So I'm reading from the

1 PAUL W. HRUZ, M.D., Ph.D.

2 differ depending on the circumstance and
3 the group and all sorts of mitigating
4 factors but they certainly could apply to
5 both.

6 Q. And are they all just
7 hypotheses?

8 A. I would say that they're --
9 because they've not been rigorously
10 studied, until you do the studies they
11 remain hypotheses.

12 There is emerging evidence
13 that would support that. That is -- but,
14 again, as I said repeatedly, this is an
15 area of medical interventions that is
16 based upon very limited quality evidence,
17 so it's still experimental.

18 Q. And what is the emerging
19 evidence that you just referred to?

20 A. The emerging evidence related
21 to the lack of long-term benefit of the
22 affirmation approach.

23 Q. Do you have personal religious
24 views about gender transition?

25 MS. LAND: Object to form and

1 PAUL W. HRUZ, M.D., Ph.D.

2 relevance.

3 A. So you are asking what are the
4 bases of my scientific premises that I
5 use in formulating --

6 Q. No. I'm not asking about the
7 basis of your scientific premise. I'm
8 just asking about your personal religious
9 views.

10 A. I have religious views. I
11 think everyone does. If one does not,
12 they are ignoring reality.

13 Q. So what are your personal
14 religious views about gender transition?

15 MS. LAND: Objection to form,
16 relevance and scope.

17 A. I am a physician-scientist,
18 and I'm a pediatric endocrinologist. I
19 look at all of -- again, this gets back
20 to your question earlier about the
21 relationship between faith and reason.
22 And I have repeatedly stated in many
23 venues that there is no contradiction
24 between faith and reason. Yet my focus
25 is on science, which would fall in the

1 PAUL W. HRUZ, M.D., Ph.D.

2 category of reason.

3 So that I don't see any
4 conflict between what I can know by
5 science versus what others can understand
6 on the basis of a faith understanding.
7 But they're not mutually exclusive and
8 everything that I have seen from a
9 rigorous attempt at unbiased assessment
10 of the scientific evidence is in concert
11 with those statements that are made in
12 nonscientific rounds related to theology
13 or philosophy.

14 Q. So let's say there were a
15 dozen studies, including randomized
16 trials that met the standards that you
17 believe for rigorous assessment and
18 institutional review board oversight that
19 demonstrated the effectiveness of
20 cross-sex hormone therapy to treat gender
21 dysphoria, would you support the
22 treatment even though it's still distorts
23 biological reality, as you describe it?

24 MS. LAND: Objection to form.

25 A. My understanding, I have never

1 PAUL W. HRUZ, M.D., Ph.D.

2 in my entire life, in my professional
3 career, ever experienced that conflict
4 and I doubt very highly that that would
5 ever occur. But I, again, am a
6 physician-scientist and I follow the
7 facts where they lead.

8 Q. So I just -- since we're
9 allowed to ask -- sorry -- I just want to
10 ask again because you didn't answer the
11 question; do you have personal religious
12 views about gender transition separate
13 from what you explained about your
14 medical views?

15 MS. LAND: Objection to form,
16 asked and answered.

17 A. It doesn't occur in a vacuum.
18 So my religious views cannot be
19 disassociated from my scientific views.
20 But I've already answered your question
21 that I do have religious views.

22 Q. And what are they?

23 MS. LAND: Objection to form,
24 asked and answered.

25 A. They are in consonant from

1 PAUL W. HRUZ, M.D., Ph.D.

2 what I've learned from science that I
3 described in very much detail within my
4 declaration and throughout this
5 deposition.

6 Q. What are they with respect to
7 gender transition?

8 MS. LAND: Objection to form,
9 asked and answered.

10 A. I would say there is an
11 intrinsic teleologic relationship between
12 male and female for the purpose of
13 reproduction. That's a basic scientific
14 fact. It can also be understood from a
15 theological or philosophical perspective.
16 They are not in conflict with each other.

17 There are approaches to
18 medical care that seek to preserve the
19 integrity of the human person, and that
20 understanding of that teleologic
21 relationship again where the science that
22 I've seen thus far has been entirely in
23 concert with statements that are made
24 from a philosophical or theological
25 perspective.

1 PAUL W. HRUZ, M.D., Ph.D.

2 All of the things that I put
3 forward are not in contradiction, yet --
4 and thus, in no way have felt any
5 conflict in putting forward my scientific
6 understanding based upon the scientific
7 premises for hypotheses that any
8 physician-scientist would attempt to do
9 to address a very complex and important
10 problem.

11 Q. Okay. So are there any medical
12 treatments -- are there any
13 pharmacological treatments that you
14 support to treat adults with gender
15 dysphoria based on the current state of
16 the science?

17 MS. LAND: Objection, form.

18 A. Well, again, my perspective --
19 are you asking in my clinical experience
20 or in my research that I have done in the
21 medical literature?

22 I would say that the same
23 objections that I have for the quality of
24 the evidence. In fact, really the most
25 solid evidence that we have on long-term

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C E R T I F I C A T E

I, MAUREEN M. RATTO, a
Registered Professional Reporter, do
hereby certify that prior to the
commencement of the examination, PAUL
W. HRUZ, M.D., Ph.D. was sworn by me to
testify the truth, the whole truth and
nothing but the truth.

I DO FURTHER CERTIFY that the
foregoing is a true and accurate
transcript of the proceedings as taken
stenographically by and before me at
the time, place and on the date
hereinbefore set forth.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor
attorney nor counsel of any of the
parties to this action, and that I am
neither a relative nor employee of such
attorney or counsel, and that I am not
financially interested in this action.



MAUREEN M. RATTO, RPR

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I N D E X

WITNESS: PAUL W. HRUZ, M.D., 7
Ph.D.
DIRECT EXAMINATION MR. STRANGIO 8

E X H I B I T S

Exhibit Hruz 1, Expert Report of 18
Paul Hruz, dated December 10,
2021,
Exhibit Hruz 2, Expert Rebuttal 21
Report dated February 10th,
2022,
Exhibit Hruz 3, Abstract re: The 77
Use of Cross-Sex Steroids in the
Treatment of Gender Dysphoria by
Paul W. Hruz
Exhibit Hruz 4, article from New 78
Atlantis entitled Growing Pains,
Exhibit Hruz 5, article from 83
NCBC entitled Experimental
Approaches to Alleviating Gender
Dysphoria in Children by Paul W.
Hruz, MD
Exhibit Hruz 6, National 225
Catholic Bioethics Quarterly

1 Submission Guidelines,
2 Exhibit Hruz 7, Amicus Brief re: 274
3 Nicholas Meriwether
4 Exhibit Hruz 8, amicus brief re: 299
5 Gloucester County School Board
6 v. Deirdre Grimm,
7 Exhibit Hruz 9, statement from 307
8 Florida Department of Health re:
9 Treatment of Gender Dysphoria
10 for Children and Adolescents
11 dated April 20, 2022

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1 Amanda Land, Esq.,
2 aland@arkansasag.gov

3 June 3, 2022

4 RE: Brandt, Dylan Et Al v. Rutledge, Leslie Et Al.
5 5/25/2022, Paul Hruz , M.D. (#5163582)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 erratas-cs@veritext.com.

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,
23 Veritext Legal Solutions
24
25

1 Brandt, Dylan Et Al v. Rutledge, Leslie Et Al.

2 Paul Hruz , M.D. (#5163582)

3 E R R A T A S H E E T

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21 REASON _____

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24 Paul Hruz , M.D.

Date

25

1 Brandt, Dylan Et Al v. Rutledge, Leslie Et Al.

2 Paul Hruz , M.D. (#5163582)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Paul Hruz , M.D., do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10

11

Paul Hruz , M.D. Date

12

13

*If notary is required

14

SUBSCRIBED AND SWORN TO BEFORE ME THIS

15

_____ DAY OF _____, 20__.

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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