IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

IN RE THE PETITION OF:

NOAKER, NOAKER, A/KIAA/KIANOAKER, A/KlA VON NOAKER, A/KlA

A/KlA PRISCYLLA RENEE VON NOAKER

FOR A NAME CHANGE TO: PRISCYLLA RENEE VON NOAKER

James C. Martin (PA 204336) Gregory D. Vose (PA 324912) Zachary S. Roman (PA 325730) Oluwaseyi A. Odunaiya (PA 329124) REED SMITH LLP 225 Fifth Avenue Pittsburgh, PA 15222 (412) 288-3131

Gabriel Arkles* David Brown* TRANSGENDER LEGAL DEFENSE & **EDUCATION FUND** 520 8th Ave., Ste. 2204 New York, NY 10018 (646) 993-1688 *pro hac vice forthcoming

CIVIL DIVISION

I-JI30 -G.D. No.

AFFIDAVIT OF NOAKER, a/k/a PRISCYLLA RENEE VON NOAKER

Code: ___

Filed on behalf of Petitioner

M. Patrick Yingling (PA 311786) REED SMITH LLP 10. S. Wacker Dr., 40th Fl. Chicago, IL 60606 (312) 207-2834



AFFIDAVIT OF NOAKER, a/k/a PRISCYLLA RENEE VON NOAKER

Before me, the undersigned authority, personally appeared Noaker, a/k/a Priscylla Renee Von Noaker, who being duly sworn and of sound mind, states as follows:

- 1. My given name is Noaker, although I am known as and identify as Priscylla Renee Von Noaker.
 - 2. I submit this affidavit in support of the petition for a name change.
- 3. I am over 18 years old and a resident of the Commonwealth of Pennsylvania.
- 4. I strongly object to my given name. It is not the name by which I am known in the community nor how I express my identity.
 - 5. I am a 70-year-old transgender woman who prefers female pronouns.
- 6. I identify as American Indian Two Spirit and teach about Two Spirit and transgender issues. Specifically, my lineage is Lenape and Tsalagi (more commonly known as Cherokee).
- 7. As part of my religious beliefs and practices as an American Indian Two Spirit person, I believe that within me there are two different spirits-male and female. I believe that the female spirit is stronger. To adhere to my religion, I must honor my female spirit, including by bearing the name consistent with that spirit-Priscylla Renee.

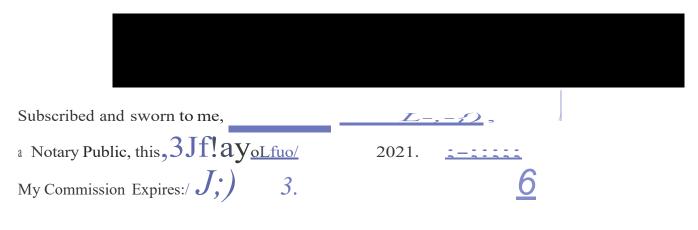
- 8. Almost 35 years ago, in 1987, I was convicted of rape and served 10 years in prison. Since then, my record has been clean. I have tried hard to change for the better and contribute to my community. I volunteer with a number of American Indian groups, and seek to educate the public about our communities.
- 9. I want to change my name under Pennsylvania law because I want a name that matches my gender expression and identity and that is consistent with my religious and cultural beliefs. Also, Priscylla Renee Von Noaker is simply who I am.
- 10. The name currently on my government-issued ID card does not match my gender expression or identity. And it does not honor my female spirit.
- I have suffered from a recent heart attack, as well as anemia and low hemoglobin count. My doctors tell me I will need major surgery within the next few months.

 But when I go to the hospital for treatment, I cannot use my chosen name; instead, I must use a name that does not match my gender expression and with which I have never identified. Some of the doctors and medical staff at the hospital address me by my given name, and I need to constantly remind them to use my chosen name. It is especially painful to hear that name at times when I am so vulnerable, and it makes me even more anxious about needing further medical care.
- 12. The mismatch between my gender expression and identity and the name on my government-issued ID adds to my fear of being abused or subject to violence because I am a transgender woman.

13. The constant need to identify myself with an unwanted name that does not match my gender expression and identity is psychologically tolling and a detriment to my emotional well-being.

I, Noaker, a/k/a Priscylla Renee Von Noaker, being duly sworn according to law, depose and say that the facts above set forth are true and correct to the best of my knowledge, information and belief and I expect to be able to prove the same at any hearing hereof.

FURTHER AFFIANT SAYETH NOT.



Commonwealth of Pennsylvania • Notary Seal SALL £ A PAGANO • Notary Public Alle11heny County My Commission Expires Dec 19, 2023 Commission Number 1203617