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4 **IN THE CIRCUIT COURT OF THE STATE OF OREGON**
5 **FOR THE COUNTY OF MULTNOMAH**

6 DANE HADACHEK, an individual,
7 NATHANIEL HELLEWELL, an individual,
8 LONDON MOODY, an individual

9 Plaintiffs,

10 v.

11 THE STATE OF OREGON

12 Defendant.

No. 25CV18224

DECLARATION OF CHRISTOPHER J.
COLD M.D., IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

13
14 I, Christopher J. Cold, M.D., declare as follows:

15 **CREDENTIALS**

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17 1. I reside in Marshfield, Wisconsin and attended university at the University of
18 Nebraska in Omaha, Nebraska.

19 2. I received my M.D. degree from University of Nebraska College of Medicine
20 in 1984.

21 3. I practiced medicine as a pathologist in the Department of Pathology,
22 Marshfield Clinic, 1000 North Oak Avenue, Marshfield, Wisconsin 54449 until 2015, and then
23 was an attending physician at the University of Wisconsin at Madison from 2015–2020.

24 4. I am also a medical scholar with particular expertise concerning the male and
25 female prepuce. In 1999, John R. Taylor and I published a comprehensive article concerning
26 the anatomy, physiology, innervation, immunology, and sexual function of the prepuce:

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2 Christopher J. Cold & John R. Taylor, The Prepuce: Anatomy, Physiology, Innervation,
3 Immunology, and Sexual Function, 83 B.J.U. Int'l 34 (1999) ("The Prepuce"). The article has
4 been cited hundreds of times in the medical and scientific literature and remains one of the
5 most frequently cited publications concerning the anatomy and function of the prepuce.
6

7 **SUMMARY OF OPINIONS**

8 5. The male and female prepuce are normal, homologous anatomical structures
9 that share a common embryological origin and are initially identical during embryonic
10 development. They remain substantially similar in anatomy, histology, physiology,
11 immunology, innervation, and sexual function, serving important protective, sensory,
12 immunological, sexual, and lubricative roles.
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14 6. Numerous principles of medical ethics prohibit physicians from performing
15 unnecessary surgery on a healthy child. Because the male and female prepuce are homologous
16 structures that are substantially similar in origin, anatomy, and function, there is no valid
17 medical or ethical basis for protecting one while denying equivalent protection to the other.
18 There are no differences between the prepuce in the male and female that warrant denying that
19 protection.
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21 **EXPERT MEDICAL OPINIONS**

22 **Common and Normal Anatomical Structure**

23 7. The prepuce is a common anatomical structure of the external genitalia of both
24 males and females. It is present in all human populations and throughout the primate order,
25 including non-human primates. The prepuce has existed in primates for at least 65 million
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3 years and likely for more than 100 million years based on its widespread presence among
4 mammals. Cold & Taylor, The Prepuce, 83 B.J.U. Int'l 34 (1999).

5 8. In males, the prepuce covers and protects the glans penis. In females, the
6 prepuce (clitoral hood) covers and protects the glans clitoris. The prepuce is a normal and
7 natural component of both male and female genital anatomy. The prepuce provides normal
8 erogenous sensory information Id.

9 **Common Embryological Origin**

10 9. The penile prepuce and clitoral prepuce arise from the same embryonic tissues
11 and follow the same basic developmental pathway. During the indifferent stage of genital
12 development, the tissues that will become the male and female prepuce are morphologically
13 indistinguishable. Following sexual differentiation, these homologous tissues develop into the
14 penile prepuce in males and the clitoral prepuce in females. Thus, the male and female prepuce
15 share a common embryological origin and substantially similar developmental processes.

17 **Homologous Structures**

18 10. The penile prepuce and clitoral prepuce are homologous anatomical structures.
19 They derive from the same embryological precursors and occupy corresponding positions
20 within the male and female genitalia. Anatomists recognize the clitoral prepuce as the female
21 homolog of the penile prepuce.
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23 **Substantially Similar Histology**

24 11. The male and female prepuce share substantially similar histological
25 characteristics. Both consist of specialized mucocutaneous tissue containing blood vessels,
26 nerves, connective tissue, and immunologically active cells. Both are highly vascularized and

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3 innervated tissues adapted to perform specialized protective, sensory, immunological, and
4 sexual functions.

5 **Substantially Similar Physiological Functions**

6 12. The male and female prepuce perform substantially similar physiological
7 functions and contribute to the normal structure and function of the external genitalia.

8 **Protective Functions**

9 13. The prepuce protects the glans from mechanical injury, abrasion, drying, and
10 environmental irritation. By covering the glans, the prepuce helps preserve the normal
11 condition of this specialized mucosal tissue.
12

13 **Immunological Functions**

14 14. The prepuce contains immunologically active tissues and cells, including
15 Langerhans cells and other components of the body's immune system. These tissues contribute
16 to local immune surveillance and defense against infection.
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18 **Sensory Functions**

19 15. The prepuce contains specialized sensory structures and nerve endings that
20 contribute to tactile sensation and genital sensitivity. The prepuce is among the most highly
21 innervated tissues of the external genitalia.

22 **Sexual Functions**

23 16. The prepuce is specialized erogenous tissue that contributes to normal sexual
24 response and function. Its sensory structures and mobility play a role in sexual sensation and
25 sexual activity.
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Lubricative Functions

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17. The prepuce helps maintain the glans as a protected mucosal surface and contributes to normal tissue moisture, lubrication, and mobility. These functions assist in preserving the health and normal physiological condition of the glans.

ETHICAL OPINION

18. Numerous principles of medical ethics prohibit physicians from performing unnecessary surgery on a healthy child. These ethical principles apply equally to the healthy prepuce of both male and female children. As stated above, the male and female prepuce are homologous structures that are substantially similar in embryological origin, anatomy, histology, physiology, immunology, innervation, and function. There is no valid medical or ethical basis for protecting one while denying equivalent protection to the other.

19. Every human deserves to have complete genitalia regardless of societal ritualistic beliefs.

20. The opinions expressed in this declaration are based upon my education, training, experience, scholarship, and review of the relevant medical literature.

21. Attached hereto as exhibits are materials that I have reviewed and that support the opinions expressed in this declaration. Specifically, **Exhibit 1** is a true and accurate diagram of the embryological development of the male and female anatomy at issue.

22. **Exhibit 2** is a true and accurate copy of an 18-week fetus with the prepuce fused to the glans clitoris.

23. **Exhibit 3** is a true and accurate copy of a picture from Joni Blank’s book “Femalia”. The frenulum of the clitoris comes off the labia minora to the ventral glans clitoris. The picture demonstrates the similarities between the male and female prepuce

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3 24. **Exhibit 4** is a true and accurate copy of another picture from Joni Blank's book
4 "Femalia", which also shows the female prepuce and glans clitoris.

5 25. **Exhibit 5** is a true and accurate picture of the clitoral hood from my cadaver
6 study.

7 26. **Exhibit 6** is a true and accurate picture from John Taylor's article to show
8 damage and loss of male genital tissue after circumcision.

9 27. **Exhibit 7** is a true and accurate picture of a normal adult male with a complete
10 penis. This picture demonstrates the male frenulum, and the preputial orifice is stretched open.
11

12 28. **Exhibit 8** is a true and accurate picture of a circumcised adult male with
13 circumferential circumcision and loss of normal prepuce and penile mucosa.

14 29. **Exhibit 9** is a true and accurate picture of an infant circumcision site with loss
15 of foreskin and abnormal exposure of the glans penis. Note mucosal color difference of glans
16 penis and shaft skin. This is an autopsy photograph.
17

18 I declare under penalty of perjury under the laws of the State of Oregon and the State
19 of California that the foregoing is true and correct and that this Declaration was executed by
20 me on this 4th day of August 2026, at Marshfield, Wisconsin.

21 Dated: August 4, 2026
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Respectfully submitted,

23 /s/ Christopher J. Cold
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Christpher J. Cold, M.D.
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EXHIBIT 1

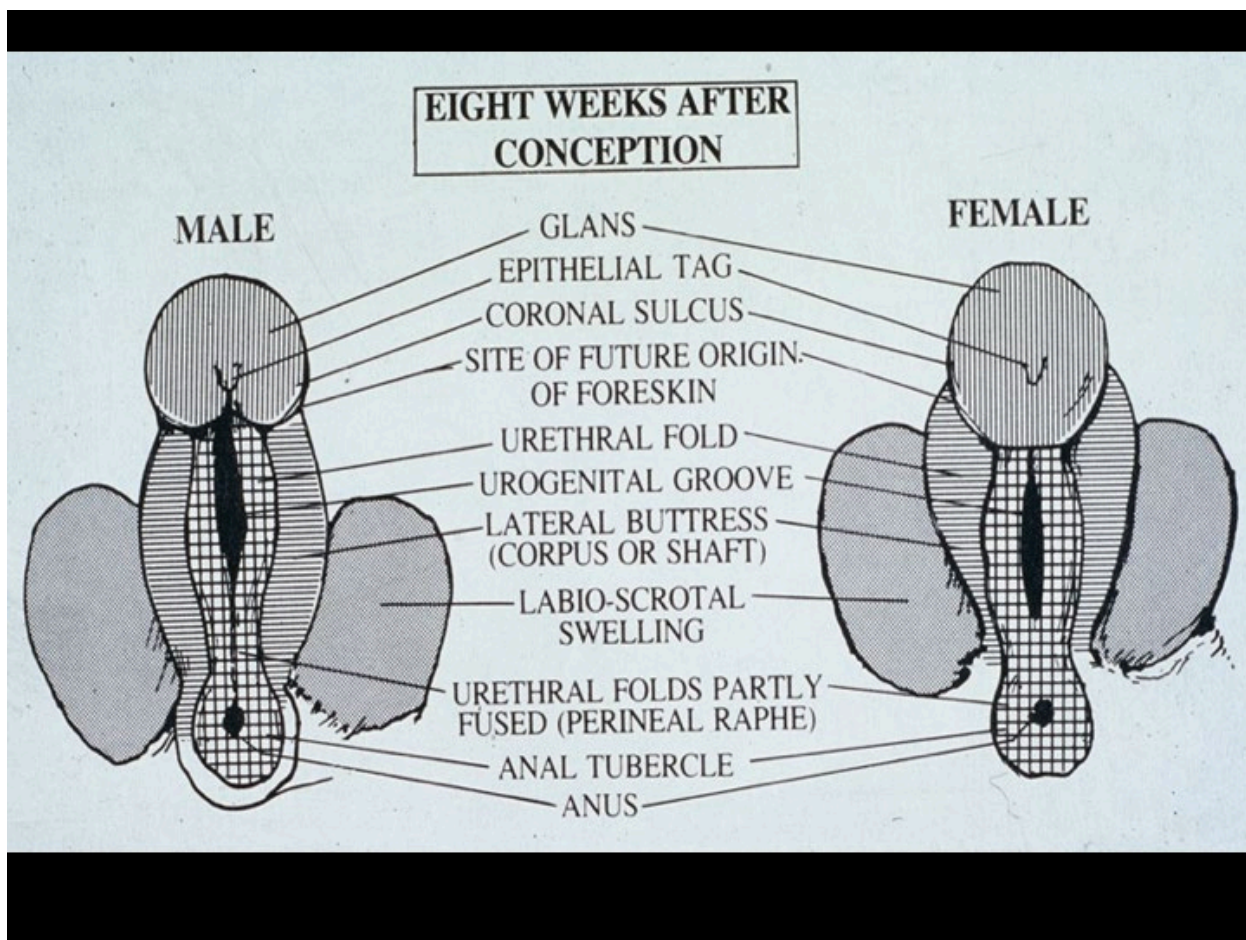


EXHIBIT 2

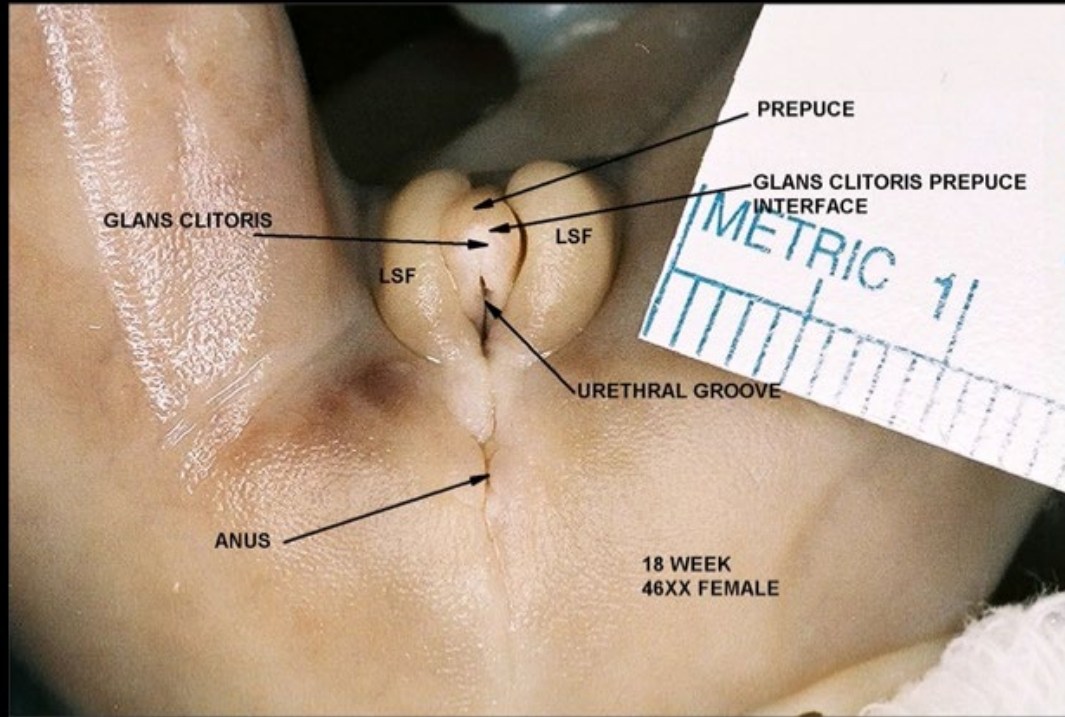


EXHIBIT 3



EXHIBIT 4



EXHIBIT 5

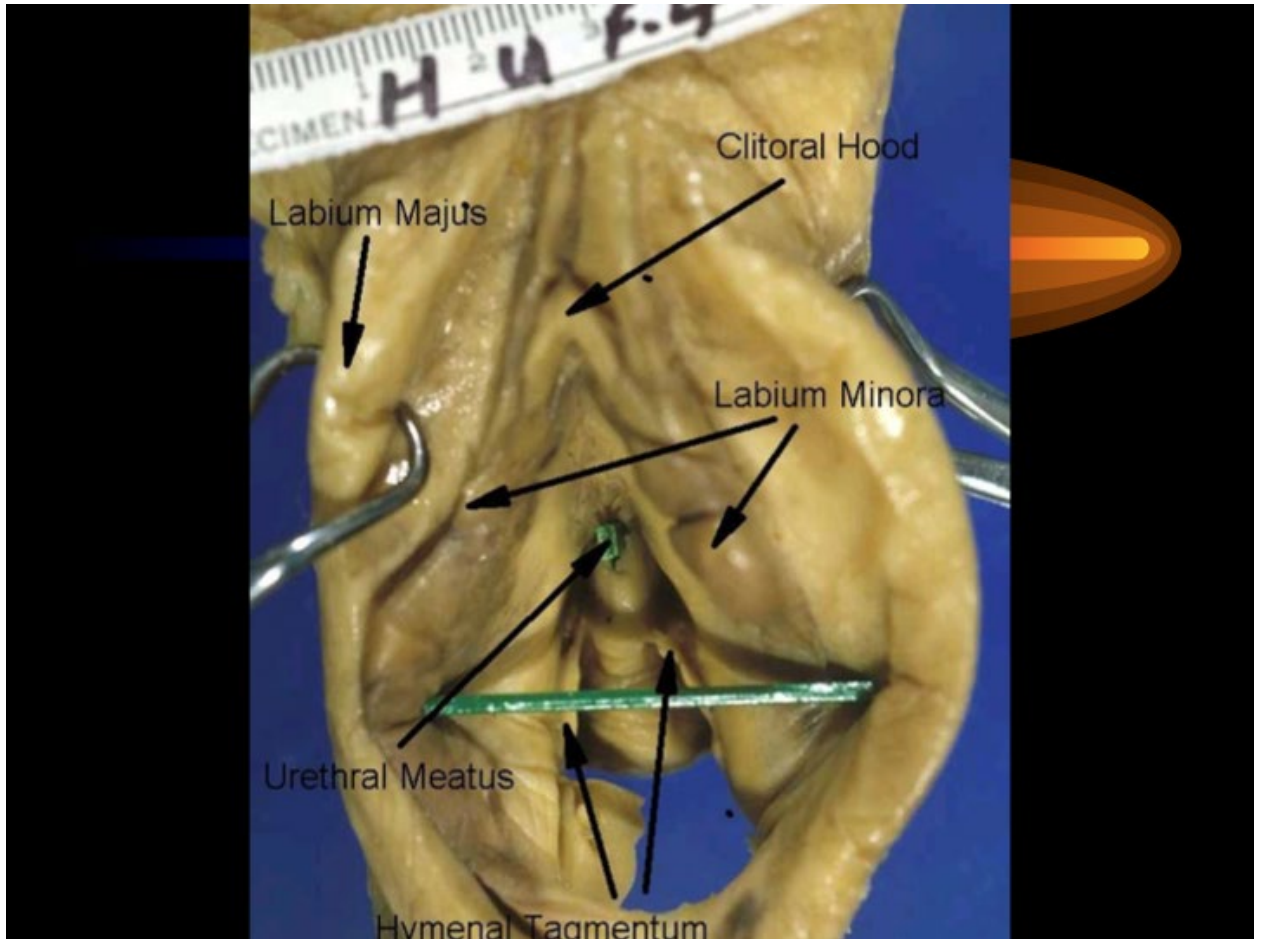


EXHIBIT 6



Fig. 1. A circumcised penis from a patient aged 3 years; note the location of the skin incision on the mid-shaft of the penis.

EXHIBIT 7



EXHIBIT 8



EXHIBIT 9

