

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

JANE DOE, et al.,

Plaintiffs,

v.

JAMES R. MCHENRY III, *in his official capacity as* Acting Attorney General of the United States; WILLIAM LOTHROP, *in his official capacity as* Acting Director of the Federal Bureau of Prisons,

Defendants.

Case No.: 1:25-cv-00286

**PLAINTIFFS' MOTION FOR EMERGENCY TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs Jane Doe, et al., respectfully file this motion for entry of a temporary restraining order and/or preliminary injunction as to all Defendants. Plaintiffs rely on the concurrently filed memorandum of points and authorities, the Complaint, and other documents filed in this action to support their requested relief. Pursuant to Local Civil Rule 7(m), undersigned counsel states that this motion was filed before counsel for Defendants filed an appearance, so they have not been able to attempt to resolve by agreement the issues raised in the motion.

Plaintiffs respectfully request that the Court schedule an expedited hearing on this motion. As explained in the accompanying memorandum, expedition is essential because Plaintiffs face imminent transfer to men's facilities in the coming days and the termination of necessary medical care for their gender dysphoria, which will place them immediately at serious risk of harm. Pursuant to Local Rule 65.1(a), this motion is accompanied by a certificate of

counsel stating that notice of the time of making this application and copies of all pleadings and papers filed in this action to date have been furnished to Defendants.

Dated: January 30, 2025

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2025, a copy of the foregoing Motion for Temporary Restraining Order and Preliminary Injunction and supporting memorandum and declarations were filed electronically. Notice of this filing and copies of all filings to date in this action have been sent by electronic mail to counsel for Defendants, as follows:

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Dated: January 30, 2025

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