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13 \*motion for admission *pro hac vice* forthcoming

14 Attorneys for Plaintiffs

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
18

19 Z.A., a minor, by and through their parent,  
A.A.; Z.B., a minor, by and through their  
20 parent, B.B.; Z.C., a minor, by and through  
their parent, C.C.; Z.D., a minor, by and  
21 through their parent, D.D.; Z.E., a minor,  
by and through their parent, E.E.; and F.F.,

22 Plaintiffs,

23 v.

24 LUCILE SALTER PACKARD  
CHILDREN’S HOSPITAL AT  
25 STANFORD, a California nonprofit public  
benefit corporation,

26 Defendant.  
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Case No. 5:26-cv-04998

**PLAINTIFFS’ EX PARTE NOTICE OF  
MOTION FOR TEMPORARY  
RESTRAINING ORDER**

Trial Date: None Set

1 Plaintiffs Z.A., Z.B., Z.C., Z.D., Z.E., and F.F. (collectively, “Plaintiffs”)  
2 respectfully submit this Ex Parte Notice of Plaintiffs’ Motion for a Temporary Restraining  
3 Order (“TRO”). Plaintiffs seek emergency relief enjoining Defendant Lucile Salter  
4 Packard Children’s Hospital at Stanford (“Stanford”) and all persons acting in concert with  
5 it or on its behalf from producing, transmitting, disclosing, or otherwise making available  
6 to the United States, the Department of Justice, the grand jury sitting in the United States  
7 District Court for the Northern District of Texas, or any agent or representative of any of  
8 these entities, any records, documents, or information responsive to specifications 12–14  
9 of the grand jury subpoena, or otherwise providing Plaintiffs’ identifying information or  
10 protected health information (“PHI”) to any of these persons or entities.

11 This Motion is made on the grounds that Plaintiffs face immediate and irreparable  
12 harm if Stanford produces their identifying information and PHI in response to a Subpoena  
13 to Testify Before Grand Jury issued, on information and belief, to Stanford by the United  
14 States District Court for the Northern District of Texas. On information and belief, the  
15 return date for the grand jury subpoena is no later than June 10, 2026. Unless this Court  
16 acts before that date, Plaintiffs constitutionally protected medical records will be  
17 irreversibly disclosed to federal prosecutors, permanently destroying Plaintiffs’ privacy  
18 interests and rendering any subsequent relief meaningless.

19 This Motion is based on the accompanying Complaint for Declaratory and  
20 Injunctive Relief; the accompanying Memorandum in Support of Plaintiffs’ Motion for a  
21 Preliminary Injunction, Temporary Restraining Order and Order to Show Cause; the  
22 accompanying proposed Order to Show Cause and Temporary Restraining Order; the  
23 accompanying supporting declarations; as well as the papers, evidence, and records on file  
24 in this action, and any other written or oral evidence or argument presented at or before the  
25 time this Motion is heard by the Court.

26 A TRO is warranted because: (1) Plaintiffs are likely to succeed on the merits of  
27 their constitutional claims under the Fifth Amendment; (2) Plaintiffs will suffer irreparable  
28 harm absent immediate relief, as the disclosure of their identifying information and PHI

1 would permanently and irrevocably destroy their privacy interests; (3) the balance of  
2 equities tips sharply in Plaintiffs' favor, as Stanford would suffer no cognizable harm from  
3 a brief delay in producing the specific patient-identifying records at issue; and (4) an  
4 injunction is in the public interest because it is always in the public interest to prevent the  
5 violation of a party's constitutional rights.

6 Plaintiffs have made diligent efforts to provide notice to Defendant's counsel of this  
7 Motion, as set forth in the accompanying declaration of Kara Janssen filed in support of  
8 this Motion.

9 WHEREFORE, Plaintiffs respectfully request that this Court:

- 10 1. Issue a Temporary Restraining Order enjoining Stanford and all persons acting in  
11 concert with it or on its behalf from producing, transmitting, disclosing, or  
12 otherwise making available Plaintiffs' identifying information or PHI in response to  
13 the grand jury subpoena or any substantially similar subpoena, order, or request;
- 14 2. Issue an Order to Show Cause why a preliminary injunction should not be entered  
15 on the same terms;
- 16 3. Grant such other and further relief as the Court deems just and proper.

17  
18 DATED: May 27, 2026

Respectfully submitted,

19 ROSEN BIEN GALVAN & GRUNFELD LLP

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21 By: */s/ Kara J. Janssen*

22 Kara J. Janssen

23 Attorneys for Plaintiffs  
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