

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NICOLAS TALBOTT, ERICA VANDAL, KATE)
COLE, GORDON HERRERO, DANY)
DANRIDGE, JAMIE HASH, MIRIAM)
PERELSON, MINERVA BETTIS, AUDRIE)
GRAHAM, ROAN PICKETT, AMIAH SALE,)
QUINN TYSON, CLAYTON McCALLISTER,)
GREYSON SHISHKINA, KODA NATURE,)
CAEL NEARY, MICHELLE BLOOMROSE,)
SAMUEL AHEARN, VERA WOLF, and REGAN)
MORGAN,)

Plaintiffs,)

v.)

THE UNITED STATES OF AMERICA; PETER)
B. HEGSETH, in his official capacity as Secretary)
of Defense; MARK AVERILL, in his official)
capacity as Acting Secretary of the Army; the)
UNITED STATES DEPARTMENT OF THE)
ARMY; TERENCE EMMERT, in his official)
capacity as Acting Secretary of the Navy; the)
UNITED STATES DEPARTMENT OF THE)
NAVY; GARY ASHWORTH, in his official)
capacity as Acting Secretary of the Air Force; the)
UNITED STATES DEPARTMENT OF THE AIR)
FORCE; TELITA CROSLAND, in her official)
capacity as Director of the Defense Health Agency;)
and the DEFENSE HEALTH AGENCY,)

Defendants.)

Civil Action No. 25-cv-240-ACR

PLAINTIFFS' RENEWED APPLICATION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Rule 65(c)—and as directed by the Court’s February 25, 2025 Minute Order—and supported by the Memorandum of Law and Declarations submitted herewith, Plaintiffs move for a preliminary injunction prohibiting

Defendants from implementing President Trump’s January 27, 2025 executive order (the “Order”) and the February 26, 2025 Department of Defense Memorandum titled, “Additional Guidance on Prioritizing Military Excellence and Readiness,” (the “Implementing Guidance”) effectively banning transgender people from serving in the United States Armed Forces. For the reasons discussed in the accompanying Memorandum of Law, the Order and Implementing Guidance violate Plaintiffs’ rights to equal protection under the Fifth Amendment, and immediate injunctive relief is necessary to prevent Plaintiffs from suffering irreparable harm as a result of the Order and Implementing Guidance. The specific relief sought herein is described in the accompanying Memorandum.

A proposed order granting injunctive relief is submitted with this motion.

DATED: March 4, 2025

Respectfully submitted,

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