

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

JANE DOE, *et al.*,

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as
Attorney General of the United States, *et al.*,

Defendants.

Case No.: **1:25-cv-00286-RCL**

UNOPPOSED MOTION FOR NEW PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs Jane Doe, Mary Doe, Sara Doe, Emily Doe, Zoe Doe, Olivia Doe, Susan Doe, Lois Doe, Sally Doe, Wendy Doe, and Rachel Doe respectfully file this unopposed motion for entry of a new preliminary injunction as to all Defendants.¹

Plaintiffs rely on the concurrently filed memorandum of points and authorities, the Second Amended Complaint, and other documents filed in this action to support their requested relief. Pursuant to Local Civil Rule 7(m), undersigned counsel states that they have met and conferred with opposing counsel regarding this motion. Defendants have represented that they do not oppose this motion.

Because of Defendants' non-opposition and because the legal and factual issues are substantially similar to Plaintiffs' prior motions, Plaintiffs do not believe a hearing is necessary. If the Court desires one, Plaintiffs respectfully request that the Court schedule an expedited hearing before February 18, 2026.

¹ Plaintiff Tori Doe is no longer in BOP custody and accordingly does not seek relief through this motion.

Respectfully submitted,

Dated: February 2, 2026

/s/ Ben Hattem

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