

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JANE DOE, et al.,

Plaintiffs,

v.

PAMELA BONDI, *in her official capacity* as 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 TEMPORARY RESTRAINING ORDER
AND EXPANDED 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 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 they have met and conferred with opposing counsel regarding this motion and have not been able to resolve by agreement the issues raised herein.

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), copies of this motion and all pleadings and papers filed in this action shall be furnished to opposing counsel at the time of filing through the Court's electronic filing system.

Dated: February 21, 2025

/s/ Eve L. Hill

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