

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

JANE DOE, et al.,

Plaintiffs,

v.

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

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.

PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs Rachel Doe and Ellen Doe, respectfully file this motion for entry of a temporary restraining order as to all Defendants. 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 and have not been able to resolve by agreement the issues raised herein.

Because the legal and factual issues that pertain to the additional Plaintiffs are substantially similar to Plaintiffs' prior motions, Plaintiffs do not believe a hearing is necessary but respectfully request that the Court schedule an expedited hearing on this motion if the Court desires one. As explained in the accompanying memorandum, expedition is essential because Plaintiffs have been transferred to men's facilities and their necessary medical care for their gender dysphoria has been terminated or may imminently be terminated, which places them at imminent risk of serious 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: March 14, 2025

/s/ Kara J. Janssen

Ernest Galvan (admitted *pro hac vice*)
Kara J. Janssen (admitted *pro hac vice*)
Adrienne Spiegel (admitted *pro hac vice*)
Ben Hattem (admitted *pro hac vice*)
EGalvan@rbgg.com
KJanssen@rbgg.com
ASpiegel@rbgg.com
BHattem@rbgg.com
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
(415) 433-6830

Eve L. Hill (Bar No. 424896)
ehill@browngold.com
BROWN GOLDSTEIN & LEVY, LLP
120 E. Baltimore St., Suite 2500
Baltimore, MD 21202
Tel: (410) 962-1030
Fax: (410) 385-0869

Christopher Stoll (admitted *pro hac vice*)
Amy Whelan (admitted *pro hac vice*)
CStoll@nclrights.org
AWhelan@nclrights.org
National Center for Lesbian Rights
870 Market Street, Suite 370
San Francisco, CA 94102
Tel: (415) 365-1338
Fax: (415) 392-8442

Jennifer L. Levi (admitted *pro hac vice*)
Sarah Austin (admitted *pro hac vice*)
GLBTQ Legal Advocates & Defenders
18 Tremont Street, Suite 950
Boston, MA 02108
(617) 426-1350
jlevi@glad.org
saustin@glad.org

Attorneys for Plaintiffs