

**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 TO CONVERT PENDING MOTION FOR FURTHER
TEMPORARY RESTRAINING ORDER TO MOTION FOR FURTHER PRELIMINARY
INJUNCTION OR TEMPORARY RESTRAINING ORDER**

In light of Defendants' representation that "[i]f the Court nonetheless enters a temporary restraining order, it should also simultaneously enter a preliminary injunction, as it has done when it granted Plaintiffs' prior TRO motions," ECF 64 at 3–4, Plaintiffs hereby file this motion to convert their pending motion for a further temporary restraining order to a motion for a preliminary injunction and temporary restraining order. Plaintiffs have made no substantive changes to the motion below and the memorandum in support of this motion, except to identify the PLRA provision applicable to preliminary injunctions and to add reference to preliminary injunctions where the original document referred to temporary restraining orders. Because Plaintiffs' arguments have not changed and the parties have already fully briefed the pending motion, and in light of the ongoing harm to Rachel and Ellen Doe, as well as Defendants' representation that "[t]he relevant circumstances are unlikely to change before any TRO would expire," *id.* at 4, no further briefing is necessary.

* * *

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 preliminary injunction or 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 18, 2025

/s/ Kara J. Janssen
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