

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ALISHEA KINGDOM, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Civ. A. No. 25-691 (RCL)

**DEFENDANTS' EMERGENCY MOTION FOR EXTENSION TO PROVIDE WRITTEN
NOTICE OF THE "PROTECTIVE ORDER" OF FEBRUARY 19, 2026**

Defendants, through counsel, respectfully move on an emergency basis to extend the time for Defendants to provide written notice of the Protective Order by *tomorrow* (ECF No. 124 at 3), pending adjudication of Defendants' Motion for Reconsideration of the "Protective Order" of February 19, 2026 (ECF No. 134).

Pursuant to the Protective Order, "within 14 days of this order, Defendants shall provide written notice to wardens at all BOP facilities at which as class member is incarcerated, describing this order and attaching it. Within 14 days of this order, Defendants shall also provide written notification and a copy of this order to all class members via individual delivery, posted notification or the tablet system." *The 14-day deadline expires tomorrow, March 5, 2026.*

Defendants, however, moved for reconsideration of the Protective Order on March 3, 2026, on the grounds that the inmates' retaliation allegations that underly the Protective Order are unsubstantiated and that the Order is legally defective because it does not comply with Rule 65(d) and the Prisoner Litigation Reform Act (ECF Nos. 130, 133). At the hearing today, March 4, 2026, the Court alluded to the fact that Defendants made some valid points. Following the hearing, the

Court ordered the parties “to meet and confer” about modifying the Protective Order in light of Defendants’ reconsideration motion. Min. Entry, Mar. 4, 2026. Further proceedings thus will occur to adjudicate the reconsideration motion. Because the court-ordered notice could cause immediate harm to BOP, as explained in the Declaration of Evan Norris (ECF No. 130-5), and to avoid confusion, Defendants request an extension of the aforementioned notice provision until the Court adjudicates Defendants’ reconsideration motion.

Defendants conferred with Plaintiffs’ counsel pursuant to Local Rule 7(m). Plaintiffs respond, “Plaintiffs oppose Defendants’ motion to extend the deadlines and due dates set forth in the nonretaliation order (ECF 124).”

Dated: March 4, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

JEAN LIN
Special Litigation Counsel

/s/ M. Jared Littman
ELIZABETH B. LAYENDECKER
ALEXANDER J. YUN
M. JARED LITTMAN
Trial Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington D.C. 20005
Jared.littman2@usdoj.gov

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

ALISHEA KINGDOM, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civ. A. No. 25-691 (RCL)

[PROPOSED] ORDER

Upon consideration of Defendants’ Emergency Motion for Extension of Notice Provision of the “Protective Order” of February 6, 2026, it is hereby **ORDERED** that:

Defendants’ motion is **GRANTED**.

The deadline for Defendants to “provide written notice to wardens at all BOP facilities at which as class member is incarcerated, describing this order and attaching it [and] to provide written notification and a copy of this order to all class members via individual delivery, posted notification or the tablet system” is extended until the Court adjudicates Defendants’ Motion for Reconsideration of the “Protective Order” of February 19, 2026.

DATED:

Royce C. Lamberth
United States District Judge