

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

ALISHEA KINGDOM, et al.,
Plaintiffs,

v.

DONALD J. TRUMP, et al.,
Defendants.

Case No. 1:25-cv-00691-RCL

**PLAINTIFFS' MOTION FOR RENEWED
PRELIMINARY INJUNCTION**

Under Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs respectfully move the Court to issue a renewed preliminary injunction (“PI”) for a 90-day period from December 1, 2025, to March 1, 2026. Plaintiffs rely on the concurrently filed memorandum of points and authorities, and other documents filed in this action.

Undersigned counsel affirms they conferred with opposing counsel about this motion, as Local Civil Rule 7(m) requires. On October 28, 2025, Counsel for Defendants stated:

Defendants oppose the relief sought in this motion, pursuant to Local Rule 7(m), because under the PLRA, preliminary injunctions “automatically expire on the date that is 90 days after its entry.” Additionally, Defendants oppose the relief sought in this motion because the Federal Bureau of Prison’s implementation of Executive Order No. 14168 is consistent with law. See ECF No. 35 (Defendants’ response to Plaintiffs’ preliminary injunction motion); ECF No. 52-1 (Defendants’ sur-reply). Defendants do not plan on filing any further opposition.

See Declaration of Corene Kendrick, Ex. 1.

Plaintiffs believe a hearing is unnecessary, as the legal and factual issues are identical to those in Plaintiffs’ original motion, ECF No. 7, and in Plaintiffs’ August motion to extend the original PI, ECF No. 78 (which the Court granted, *see* ECF No. 79). However, if the Court desires a hearing, Plaintiffs respectfully request it be scheduled on an expedited basis, as the current PI

(ECF No. 79) expires on November 30, 2025.¹

Dated: October 31, 2025

Respectfully submitted,

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¹ If the Court does not rule before December 1, 2025, it may still renew the preliminary injunction to run for 90 days from the date of a new order's entry. *Alloway v. Hodge*, 72 F.App'x 812, 817 (10th Cir. 2003) (unpublished) (affirming renewal of injunction that expired months earlier); *see also Porretti v. Dzurenda*, Case No. 2:17-cv-01745-RFB-DJA, 2020 WL 6834234, *1 (D. Nev. Aug. 31 2020), *aff'd*, 11 F.4th 1037, 1052 (9th Cir. 2021).