

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

JANE DOE, *et al.*,

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as
Acting Attorney General of the United States,
et al.,

Defendants.

Case No.: 1:25-cv-286-RCL

CONSENT MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Pursuant to Rule 15 of the Federal Rules of Civil Procedure and Local Civil Rule 7(i), Plaintiffs respectfully requests that the Court grant Plaintiffs leave to file the Second Amended Complaint attached hereto to add two additional plaintiffs and associated claims. A copy of the proposed Second Amended Complaint is attached hereto, as required by Local Civil Rule 15.1. Plaintiffs met and conferred with Defendants and Defendants confirmed in writing that they do not oppose this motion.

Plaintiffs filed their Complaint on January 30, 2025 on behalf of three individuals impacted by Executive Order 14168. Dkt. No. 1. On February 21, 2025, Plaintiffs filed an Amended Complaint to add nine more individuals impacted by Executive Order 14168. Dkt. No. 47. Since those papers were filed, Plaintiffs' counsel became aware of two additional transgender women who have been transferred to male facilities pursuant to Executive Order 14168 and seek to file a Second Amended Complaint to add those individuals and their associated claims.

Under Rule 15(a)(2) of the Federal Rules of Civil Procedure, a party may amend its pleading if the opposing party consents to the amendment in writing. Fed. R. Civ. P. 15(a)(2);

see also *Parker v. John Moriarty & Assoc.*, 320 F.R.D. 95, 97 (D.D.C. 2017) (Under Rule 15(a)(2), leave to amend “should be freely given unless there is a good reason to the contrary.”) (citing *Willoughby v. Potomac Elec. Power Co.*, 100 F.3d 999, 1003 (D.C. Cir. 1996)). Courts in this district routinely grant motions to amend complaints when defendants consent to such amendments. See, e.g., Minute Order, *United States v. Deutsche Telekom AG*, No. 19-02232 (November 8, 2019) (granting consent motion to amend complaint); Minute Order, *Boykin v. United States*, No. 17-2569 (May 25, 2018) (same). The only difference between the original Complaint and the Amended Complaint is the addition of two plaintiffs and their associated claims. Therefore, Plaintiffs respectfully requests that the Court grant Plaintiffs leave to file the Second Amended Complaint. A redline copy of Plaintiffs’ proposed Amended Complaint is attached as Exhibit 1; a clean copy is attached as Exhibit 2.

Dated: March 14, 2025

/s/ Kara Janssen

Kara J. Janssen (*pro hac vice granted*)
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