

**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 A
PRELIMINARY INJUNCTION, TO
STAY AGENCY ACTION, AND FOR
PROVISIONAL CLASS
CERTIFICATION**

Plaintiffs Alishea Kingdom, Solo Nichols, and Jas Kapule, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and LCvR 65, hereby move the Court for a preliminary injunction enjoining Defendants, their contractors, employees, and agents i) from enforcing Executive Order 14168¹ as applied to medical care and accommodations for people in the custody of the Bureau of Prison (“BOP”) and from enforcing the BOP’s memoranda implementing Executive Order 14168, and ii) to provide and continue providing Plaintiffs and members of the proposed class gender-affirming hormone therapy and accommodations in accordance with BOP policy and practice immediately prior to Defendant Trump’s issuance of Executive Order 14168 on January 20, 2025. Additionally, pursuant to 5 U.S.C. § 705, Plaintiffs move for a stay of enforcement of BOP’s memoranda implementing Executive Order 14168. Furthermore, Plaintiffs move to provisionally certify the class as defined in Plaintiffs’ motion for class certification, *see* ECF 8, for the purpose of emergency relief. This motion is supported by the attached Memorandum of Points and Authorities; the Declarations of Dr. Dan H. Karasic, Dr. Cathy Thompson, Alishea Kingdom, Solo Nichols, and Jas Kapule, and attached exhibits; the Proposed Order; all pleadings and files of record; and any evidence that the Court may receive at

¹ Exec. Order No. 14168, *Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, 90 Fed. Reg. 8615 (Jan. 20, 2025).

or before any hearing on this motion. Defendants oppose this motion.

Defendants oppose this motion. Pursuant to LCvR 7(f), Plaintiffs request an oral hearing on the motion.

Dated: March 17, 2025

Respectfully submitted,

David C. Fathi†
Maria V. Morris, D.C. 1697904
Elisa C. Epstein†
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
915 15th Street, N.W.
Washington, D.C. 20005
Tel: 202-393-4930
dfathi@aclu.org
mmorris@aclu.org
ee Epstein@aclu.org
† *Not admitted in D.C.; practice limited to federal courts. Pro hac vice application forthcoming.*

/s/ Michael Perloff
Michael Perloff, D.C. Bar No. 1601047
Aditi Shah*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF THE DISTRICT OF
COLUMBIA
529 14th Street NW, Suite 722
Washington, D.C. 20045
Tel: 202-457-0800
mperloff@acludc.org
ashah@acludc.org
* *Not admitted in DC; practice limited to matters before federal courts and D.C. agencies.*

Corene T. Kendrick**
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
425 California St., Ste. 700
San Francisco, CA 94104
Tel: 202-393-4930
ckendrick@aclu.org

Shawn Thomas Meerkamper**
shawn@transgenderlawcenter.org
Megan Z. F. Noor**
megan@transgenderlawcenter.org
TRANSGENDER LAW CENTER
P.O. Box 70976
Oakland, CA 94612
Tel: 510-587-9696

Li Nowlin-Sohl**
Leslie Cooper**
Shana Knizhnik, DDC Bar ID 120840
James D. Esseks**
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
Tel: 212-549-2500
lnowlin-sohl@aclu.org
lcooper@aclu.org
sknizhnik@aclu.org
jesseks@aclu.org

Lynly S. Egyes**
Lynly@transgenderlawcenter.org
Milo Inglehart**
milo@transgenderlawcenter.org
TRANSGENDER LAW CENTER
594 Dean Street, Suite 11
Brooklyn, NY 11238
Tel: 510-587-9696

** *Pro hac vice application forthcoming.*

Counsel for plaintiffs and the proposed class

CERTIFICATE OF SERVICE

I hereby certify that, on this 17th day of March 2025, I served the foregoing PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION, TO STAY AGENCY ACTION, AND FOR PROVISIONAL CLASS CERTIFICATION by emailing a copy to Defendants' counsel, John Robinson, listed below. Mr. Robinson provided written consent to receive email service on behalf of Defendants on March 17, 2025.

John Robinson
U.S. Department of Justice
John.J.Robinson@usdoj.gov
(202) 616-8489

/s/ Michael Perloff
Michael Perloff