

[NOT YET SCHEDULED FOR ORAL ARGUMENT]

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

MARIA MOE,

Plaintiff-Appellee,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States;  
PAMELA BONDI, in her official capacity as  
Attorney General of the United States; and  
WILLIAM LOTHROP, in his official  
capacity as Acting Director of the Federal  
Bureau of Prisons,

Defendants-Appellants.

No. 25-5108

**STATEMENT OF ISSUES**

Pursuant to this Court's order dated April 10, 2025, Defendants-Appellants hereby respectfully submit this Statement of Issues. The issue presented on appeal is:

Whether the district court abused its discretion in granting preliminary injunctions blocking the transfer of trans-identifying male inmates to male facilities, on the ground that any such transfer violates the Eighth Amendment.

Respectfully submitted,

GERARD SINZDAK

/s/ McKaye L. Neumeister

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APRIL 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2025, I caused to be filed with the Court and served on opposing counsel through the CM/ECF system the foregoing STATEMENT OF ISSUES.

/s/ McKaye L. Neumeister  
McKaye L. Neumeister  
Counsel for Defendants-Appellants