

EMERGENCY MOTION
FOR A T.R.O. or PRELIMINARY
INJUNCTION
(4 pages)

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In The United States District Court
For The Middle District of Florida

1 OF 4

Oscar Contreras Aguilar
AKA: Fendri G. Skyy,
v.
Donald J. Trump, et al.,
Defendants

Civil No. To be Provided.

6:25cv1096-CEM-RMN

EMERGENCY MOTION FOR A TEMPORARY RESTRAINING
ORDER & PRELIMINARY INJUNCTION

COMES NOW, the plaintiff, proceeding Pro Se, and respectfully moves the Court to issue a Temporary Restraining Order ("T.R.O.") and a Preliminary Injunction enjoining defendants and the BOP From subjecting plaintiff to Strip Searches and pat Searches by male guards; enjoining defendants and the BOP From implementing or enforcing defendant Trump's Executive Order NO. 14168 as it pertains to plaintiff; enjoining defendants From discontinuing plaintiff's gender-affirming care & treatment; and Ordering defendants to maintain the Status Quo by abiding by and operating under the recently-rescinded BOP's Transgender Offender Manual (BOP P.S. 5200.08) pending resolution of this suit; enjoining defendants From not allowing plaintiff access to, or purchase from Commissary, Female Cosmetic items such as lip gloss, make up, lipstick, hair dye, bras, panties, Eye shadow, etc... all which have been discontinued due to defendant Trump's Executive Order No. 14168.

In Support of this motion: 2 of 4
Plaintiff hereby realleges and incorporates by reference paragraphs 1-21 of her Verified Complaint (attached hereto) as if fully set forth herein.

LEGAL ARGUMENTS

As an initial matter, plaintiff respectfully submits that defendant Trump's Executive Order No. 14168 clearly discriminates on the basis of sex.

And the subsequent actions that have been taken and continue to be taken by the rest of the defendants in furtherance of Trump's Executive Order No. 14168 violate clearly established precedent/law, and subjects the plaintiff to harassment, discrimination, and state-sanctioned persecution.

The Court can easily nix defendants' actions by enjoining the BOP and defendants from implementing or enforcing Trump's executive order No. 14168 and ordering defendants to maintain the status quo pending resolution of this suit. The BOP has operated under the Transgender Offender Manual (BOP P.S. 5200.08) for years without any significant issues. The BOP's Transgender Offender Policy, *id.*, mandates BOP staff to provide prisoners including plaintiff all the requested relief in this motion. The BOP (defendants) only recently rescinded/canceled that policy due to defendant Trump's Executive Order No. 14168.

3 of 4

In other words, all of the requested relief by plaintiff in this motion and in her verified Complaint was already being provided to plaintiff pursuant to the BOP's Transgender Offender Manual (BOP.P.S.5200.08).

And defendants recently rescinded that policy and stopped providing plaintiff with the requested relief only due to defendant Trump's Executive Order No. 14168.

Thus granting this motion for a T.R.O. and Preliminary Injunction pending trial would simply continue the BOP's Status quo.

Lastly, because defendant Trump's Executive Order No. 14168 leaves the BOP and the rest of defendants no discretion to do otherwise, absent a T.R.O. or Preliminary Injunction in this case, the BOP will soon cease providing plaintiff gender-affirming care for her Gender Dysphoria, and will continue to subject plaintiff to invasive strip searches and patdown searches by male prison guards, etc---

This greatly exacerbates plaintiff's gender Dysphoria symptoms and puts her at a increased risk of serious harm or death by suicide. And plaintiff is in fact contemplating suicide due to all the above-mentioned recent events.

CONCLUSION

4 of 4

For the foregoing reasons and the Facts Stated in the attached Verified Complaint, Plaintiff respectfully Urges this Honorable Court to grant this motion For a T.R.O. and a preliminary Injunction providing the requested relief, pursuant to Fed. R. Civ. P. **65**

May 31st, 2025.
Coleman, Florida.

Respectfully Submitted,


Oscar Contreras Aguilar

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U.S. Penitentiary - Coleman 2.
P.O. Box 1034
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Plaintiff.