## UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

JANE DOE, et al.,

Plaintiffs,

v.

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

Defendants.

Case No.: 1:25-cv-00286-RCL

## UNOPPOSED MOTION FOR RENEWED PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs Jane Doe, Mary Doe, Sara Doe, Emily Doe, Zoe Doe, Tori Doe, Olivia Doe, Susan Doe, Lois Doe, Sally Doe, Wendy Doe, Rachel Doe, and Ellen Doe respectfully file this unopposed motion for entry of a new preliminary injunction as to all Defendants.

Plaintiffs rely on the concurrently filed memorandum of points and authorities, the declarations filed in support thereof, the Second Amended Complaint, and other documents filed in this action to support their requested relief. Pursuant to Local Civil Rule 7(m), undersigned counsel states that they have met and conferred with opposing counsel regarding this motion. Defendants have represented that they will not oppose this motion. ECF No. 76 at 2 n.1.

Because of Defendants' non-opposition and because the legal and factual issues are substantially similar to Plaintiffs' prior motions, Plaintiffs do not believe a hearing is necessary but respectfully request that the Court schedule an expedited hearing on this motion if the Court desires one.

Pursuant to Local Rule 65.1(c), copies of this motion and all pleadings and papers filed in this action shall be furnished to opposing counsel at the time of filing through the Court's

electronic filing system.

Dated: May 12, 2025

## /s/ Kara J. Janssen

Kara J. Janssen (admitted pro hac vice)
Ernest Galvan (admitted pro hac vice)
Adrienne Spiegel (admitted pro hac vice)
Ben Hattem (admitted pro hac vice)
EGalvan@rbgg.com
KJanssen@rbgg.com
ASpiegel@rbgg.com
BHattem@rbgg.com
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
(415) 433-6830

Eve L. Hill (Bar No. 424896) ehill@browngold.com BROWN GOLDSTEIN & LEVY, LLP 120 E. Baltimore St., Suite 2500 Baltimore, MD 21202 Tel: (410) 962-1030 Fax: (410) 385-0869

Christopher Stoll (admitted pro hac vice) Amy Whelan (admitted pro hac vice) CStoll@nclrights.org AWhelan@nclrights.org National Center for Lesbian Rights 870 Market Street, Suite 370 San Francisco, CA 94102 Tel: (415) 365-1338 Fax: (415) 392-8442

Jennifer L. Levi (admitted pro hac vice)
Sarah Austin (admitted pro hac vice)
GLBTQ Legal Advocates & Defenders
18 Tremont Street, Suite 950
Boston, MA 02108
(617) 426-1350
jlevi@glad.org
saustin@glad.org

Attorneys for Plaintiffs

[4693933.3]