

**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 RENEWED
PRELIMINARY INJUNCTION**

Under Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, named Plaintiffs and the certified Plaintiff class respectfully move the Court to issue a renewed preliminary injunction for a 90-day time period from September 1, 2025, to November 30, 2025. Plaintiffs rely on the concurrently filed memorandum of points and authorities, and other documents filed in this action. Pursuant to Local Civil Rule 7(m), undersigned counsel affirms that they conferred with opposing counsel about this motion. Counsel for Defendants stated: “Defendants oppose the relief sought in this motion, pursuant to Local Rule 7(m), because under the PLRA, preliminary injunctions ‘automatically expire on the date that is 90 days after its entry.’ Defendants do not plan on filing any further opposition.” *See* Declaration of Corene Kendrick, Ex. 1.

As the legal and factual issues are identical to Plaintiffs’ prior motion, ECF No. 7, Plaintiffs believe a hearing is unnecessary; but if the Court desires one, respectfully request it be scheduled on an expedited basis. The current injunction (ECF No. 67) expires on September 1, 2025.¹

¹ If the Court does not rule before September 1 it may still renew the preliminary injunction to run for 90 days from the date of a new order’s entry. *Alloway v. Hodge*, 72 F.App’x 812, 817 (10th Cir. 2003) (unpublished) (affirming renewal of injunction that expired months earlier); *see also Porretti v. Dzurenda*, Case No. 2:17-cv-01745-RFB-DJA, 2020 WL 6834234, *1 (D. Nev. Aug. 31 2020) (granting second injunction after defendants’ noncompliance with and expiration of first one), *aff’d*, 11 F.4th 1037, 1052 (9th Cir. 2021).

Dated: August 8, 2025

Respectfully submitted,

Michael Perloff, D.C. Bar No. 1601047
Aditi Shah, D.C. Bar No. 90033136
ACLU 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

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

Li Nowlin-Sohl (*pro hac vice*)
Leslie Cooper (*pro hac vice*)
Shana Knizhnik, DDC Bar ID 120840
James D. Esseks (*pro hac vice*)
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

David C. Fathi (*pro hac vice*) *
Maria V. Morris, D.C. Bar. No. 1697904
Elisa C. Epstein (*pro hac vice*) *
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
915 15th Street, N.W.
Washington, D.C. 20005
Tel: 202-393-4930
dfathi@aclu.org
mmorris@aclu.org
[eepstein@aclu.org](mailto:ee Epstein@aclu.org)
**Not admitted in D.C.; practice limited to federal courts.*

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

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

Counsel for Plaintiff Class