

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

REJON TAYLOR, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*, in their official capacities,

Defendants.

Case No. 1:25-cv-01161-TJK

**PLAINTIFFS COONCE, MIKOS, AND RUNYON'S
SECOND MOTION FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, Plaintiffs Coonce, Mikos, and Runyon (the "Medically At-Risk Plaintiffs"), by undersigned counsel, respectfully request that the Court issue a temporary restraining order ("TRO") enjoining all Defendants but President Trump from implementing the unlawful and unconstitutional Redesignation Directive by transferring the Medically At-Risk Plaintiffs to the U.S. Penitentiary Florence Administrative Maximum Facility ("ADX"), until such time as the Court can further consider the merits of the Medically At-Risk Plaintiffs' claims, including any motion for a preliminary injunction that the Medically At-Risk Plaintiffs may bring.¹ Upon information and belief, Defendants will begin transferring the Medically At-Risk Plaintiffs to ADX on or around October 31, 2025. Emergency relief is necessary because the circumstances are exigent and the injuries are irreparable. The attached memorandum of law, along with the supporting declaration

¹ The Medically At-Risk Plaintiffs would consent to the Court's conversion of this motion for a temporary restraining order to a motion for a preliminary injunction—such that briefing and any argument may proceed on a non-expedited basis—if Defendants would agree to refrain from transferring Plaintiffs to ADX pending the Court's resolution of such a motion.

and exhibits, set forth the grounds for this motion. A proposed TRO and a certificate of compliance with Local Civil Rule 65.1 are attached.

Dated: October 21, 2025
 Washington, DC

Brian Stull, N.C. 36002*
 Claudia Van Wyk, Penn. 95130*
ACLU FOUNDATION
 201 W. Main St., Ste. 402
 Durham, NC 27701
 Tel: (919) 682-5659
 bstull@aclu.org
 cvanwyk@aclu.org

Corene T. Kendrick, Cal. 226642*
ACLU FOUNDATION
 425 California St., Ste. 700
 San Francisco, CA 94104
 Tel: (202) 393-4930
 ckendrick@aclu.org

Laura Rovner, Colo. 35592*
 Nicole Godfrey, Colo. 41546
 Miriam Kerler, Colo. 56575
STUDENT LAW OFFICE
UNIVERSITY OF DENVER
STURM COLLEGE OF LAW
 2255 E. Evans Ave., Ste. 335
 Denver, CO 80210
 Tel: (303) 871-6140
 laura.rovner@du.edu
 nicole.godfrey@du.edu
 miriam.kerler@du.edu

Respectfully submitted,

/s/ Maria V. Morris
 David C. Fathi, Wash. 24893**
 Maria V. Morris, D.C. 1697904
 Carmen Iguina González, D.C. 1644730
 Jennifer Wedekind, D.C. 1012362
ACLU FOUNDATION
 915 15th Street NW
 Washington, DC 20005
 Tel: (202) 393-4930
 dfathi@aclu.org
 mmorris@aclu.org
 ciguinagonzalez@aclu.org
 jwedekind@aclu.org

Sara Norman, Cal. 189536*
LAW OFFICES OF SARA NORMAN
 P.O. Box 170462
 San Francisco, CA 94117
 Tel: (415) 236-3763
 sara@saranormanlaw.com

C.J. Sandley, Ala. 5317-S48R*
 Kayla Vinson, Ala. 3664-S48Q*
 D. Korbin Felder, Miss. 106643*
CENTER FOR CONSTITUTIONAL
RIGHTS
 666 Broadway, 7th Floor
 New York, NY 10012
 Tel: (212) 614-6443
 csandley@ccrjustice.org
 kvinson@ccrjustice.org
 kfelder@ccrjustice.org

Joseph Margulies, Ill. 6198353***
CORNELL UNIVERSITY
Professor of the Practice of Government
216 White Hall
Ithaca, NY 14850
Tel: (607) 255-6477
jm347@cornell.edu

David Patton*
Ian Robertson*
Krysta Kilinski*
HECKER FINK LLP
350 Fifth Ave, 63rd Floor
New York, NY 10118
Tel: (212) 763-0883
dpatton@heckerfink.com
irobertson@heckerfink.com
kkilinski@heckerfink.com

Attorneys for Plaintiffs

* *Admitted pro hac vice.*
** *Not admitted in D.C.; practice limited to federal courts. Admitted pro hac vice.*
*** *Admitted to D.D.C. as pro bono counsel.*