

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.<sup>1</sup> 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

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<sup>1</sup> 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

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