

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SEAN CURRAN, DELAWARE ADAPT,
FREEDOM CENTER FOR INDEPENDENT
LIVING, UNITED SPINAL ASSOCIATION,
NATIONAL COUNCIL ON INDEPENDENT
LIVING, NOT DEAD YET, and INSTITUTE
FOR PATIENTS' RIGHTS,

Plaintiffs,

v.

THE HONORABLE MATTHEW MEYER, in
his official capacity as Governor of the State
of Delaware, DELAWARE DEPARTMENT
OF HEALTH AND SOCIAL SERVICES,
THE HONORABLE CHRISTEN LINKE
YOUNG, in her official capacity as Secretary
of Delaware Department of Health and Social
Services, DELAWARE BOARD OF
MEDICAL LICENSURE AND DISCIPLINE,
JOSEPH PARISE, D.O. in his official capacity
as President of the Delaware Board of Medical
Licensure and Discipline, DELAWARE
BOARD OF NURSING, and JACQUELINE
MAINWARING, CRNA, APRN in her
official capacity as President of the Delaware
Board of Nursing,

Defendants.

C.A. No. _____

PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiffs Sean Curran, Delaware ADAPT, Freedom Center For Independent Living, United Spinal Association, National Council on Independent Living, Not Dead Yet, and Institute For Patients' Rights (collectively, "Plaintiffs"), by and through their undersigned counsel, hereby move pursuant to Federal Rule of Civil Procedure 65, for the entry of a Temporary Restraining Order in the form submitted herewith, enjoining Defendants Governor Matthew Meyer, the

Delaware Department of Health and Human Services, Secretary Christen Linke Young, the Delaware Board of Medical Licensure and Discipline, Joseph Parise, D.O. the Delaware Board of Nursing, and Jacqueline Mainwaring, CRNA, APRN from further implementing and enforcing Delaware's End of Life Options Act, 16 *Del. C.* § 2501C, *et seq.* The grounds for Plaintiffs' motion are more fully outlined in Plaintiffs' Opening Brief in Support of Their Motion for Temporary Restraining Order, which is filed concurrently herewith.

Date: December 8, 2025

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*Motion *pro hac vice* forthcoming

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