

Jeffrey S. Beelaert, ISB No. 12384
Preston N. Carter, ISB No. 8462
Don Z. Gray, ISB No. 10070
Megann E. Meier, ISB No. 11948
GIVENS PURSLEY LLP
601 West Bannock Street
P.O. Box 2720
Boise, Idaho 83701-2720
Telephone: (208) 388-1200
Fax: (208) 388-1300
jbeelaert@givenspursley.com
prestoncarter@givenspursley.com
dongray@givenspursley.com
mem@givenspursley.com

Attorneys for Plaintiffs

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

RAMON, by and through next friend,
G.C.; THOMAS, by and through next
friend, C.G.; CAMERON, by and
through next friend, B.E.; ANTHONY;
and WENDY,

Plaintiffs,

v.

JULIET CHARRON, in her official
capacity as Director, Idaho Department
of Health and Welfare; SASHA
O'CONNELL, in her official capacity as
Deputy Director, Idaho Department of
Health and Welfare; ROSS EDMUNDS,
in his official capacity as Administrator,
Division of Behavioral Health,

Defendants.

Case No. 1:25-cv-00676-DKG

**PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

Plaintiffs Ramon, by and through next friend, G.C.; Thomas, by and through next friend, C.G.; Cameron, by and through next friend, B.E.; Anthony; and Wendy, respectfully move this Court under Rule 65 of the Federal Rules of Civil Procedure to issue a Temporary Restraining Order and Preliminary Injunction against all the Defendants and to provide the relief set forth in the Proposed Order.

In support of their Motion, Plaintiffs rely upon the contemporaneously filed Memorandum of Law, Declarations, as well as the Complaint (Dkt. No. 1) and all other pleadings and materials filed in this case.

Dated: November 28, 2025.

GIVENS PURSLEY LLP

By /s/ Jeffrey S. Beelaert
Jeffrey S. Beelaert
Preston N. Carter
Don Z. Gray
Megann E. Meier
Attorneys for Plaintiffs