

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PAMELA BAILEY D/B/A MORE THAN
OUR CRIMES,

Plaintiff,

v.

FEDERAL BUREAU OF PRISONS,

Defendant.

Case No.

JURY TRIAL DEMANDED

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTIVE RELIEF

Pursuant to Federal Rule of Civil Procedure 65, and for the reasons set forth in the accompanying memorandum of law, Plaintiff Pamela Bailey, with and on behalf of her unincorporated non-profit organization More Than Our Crimes (“MTOC”), respectfully moves this Court for a preliminary injunction that (1) requires Defendant to restore immediately Plaintiff’s TRULINCS access at all BOP facilities, (2) prohibits Defendant from interfering with Plaintiff’s TRULINCS communications in the future absent (a) a specific, factual determination of misconduct by Plaintiff that is timely communicated to Plaintiff in writing and (b) prior approval of this Court, and (3) prohibits Defendant from taking any other action that a reasonable observer would conclude was intended to intimidate, coerce, threaten, or retaliate anyone in order to stop Ms. Bailey’s communications with sources or MTOC publications, absent prior approval of this Court.

A proposed order is attached hereto as Exhibit 1.

Dated: April 24, 2024

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ Brian T. Gilmore
Brian T. Gilmore

Joseph M. Terry (DC Bar # 473095)
Brian T. Gilmore (DC Bar # 1030601)
680 Maine Avenue, S.W.
Washington, DC 20024
T: (202) 434-5000
F: (202) 434-5029
jterry@wc.com
bgilmore@wc.com

*Counsel for Plaintiff Pamela Bailey d/b/a More
Than Our Crimes*

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of April 2024, I electronically filed the foregoing Motion, along with the Declarations of Jeremy Fontanez, Leonard Schenk, Joel Vasquez, Cory Perry, and Brian T. Gilmore (including exhibits attached thereto), the Memorandum of Law in Support of Plaintiff's Motion for Preliminary Injunction, and a Proposed Order, with the Clerk of Court using the CM/ECF system. I will cause all of the aforementioned documents to be served on Defendant along with the Complaint.

/s/ Brian T. Gilmore
Brian T. Gilmore