

Paul Carlos Southwick (ISB No. 12439)  
Emily Myrei Croston (ISB No. 12389)  
ACLU of Idaho Foundation  
P.O. Box 1897  
Boise, ID 83701  
Tel: (208) 344-9750  
[psouthwick@acluidaho.org](mailto:psouthwick@acluidaho.org)  
[ecroston@acluidaho.org](mailto:ecroston@acluidaho.org)

Chase B. Strangio\*  
Malita Picasso\*  
Leslie Cooper\*  
Alexandra R. Johnson\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad St.  
New York, NY 10004  
Tel: (212) 549-2584  
[cstrangio@aclu.org](mailto:cstrangio@aclu.org)  
[mpicasso@aclu.org](mailto:mpicasso@aclu.org)  
[lcooper@aclu.org](mailto:lcooper@aclu.org)  
[a.johnson@aclu.org](mailto:a.johnson@aclu.org)

Pilar C. French\*  
Harlan Mechling\*  
Antonia Gales\*  
Chloe Nakaya\*  
BALLARD SPAHR LLP  
601 S.W. Second Avenue, Suite 2100  
Portland, OR 97204  
Tel: (503) 778-2100  
[frenchp@ballardspahr.com](mailto:frenchp@ballardspahr.com)  
[mehlingh@ballardspahr.com](mailto:mehlingh@ballardspahr.com)  
[galesa@ballardspahr.com](mailto:galesa@ballardspahr.com)  
[NakayaC@ballardspahr.com](mailto:NakayaC@ballardspahr.com)

\*Admitted *pro hac vice*

*Attorneys for Plaintiffs*

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

**KATIE ROBINSON, et al.,**

*Plaintiffs,*

v.

**RAÚL LABRADOR, et al.,**

*Defendants.*

Case No. 1:24-cv-00306-DCN

**REPLY IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
TEMPORARY RESTRAINING  
ORDER**

In the interest of expediency, Plaintiffs incorporate their prior merits arguments in favor of the requested TRO. *See* Dkts. 2-1, 25, 80-1, 90, 114-3, 118, 134-1, 136, 143-1, 148, 167-1, 179, 183-1, 185.

In response to Plaintiffs’ request, Centurion seems to assert that it will not cut off treatment for class members but rather taper off the medicine. Dkt. 197 at 4. The relevance of this is debatable. *See* Dkt. 25 at 6 (noting that even if medication is tapered, “the result is the same—the withdrawal of necessary medical care for non-medical reasons”). This withdrawal, even as part of an “individualized plan for each impacted patient[,]” Dkt. 197 at 4, is an interruption that puts class members at risk of irreparable harm. *See* Dkt. 120 at 7 (evidence exists to show that “discontinuation of hormone therapy will lead to severe psychological distress . . . up to and including possible suicidal attempts[.]”). This ‘promise to taper’ does not change the fact that class members’ treatment will be interrupted between the lapse of the current preliminary injunction and any future injunction, not because their medical provider has determined that they no longer need the treatment but instead, as Centurion acknowledges, because the treatment is prohibited by law. There is no reason to subject the class to these fluctuations in their access to physician-prescribed medical care for no medical reason.

Plaintiffs ask the Court to issue the requested TRO urgently to continue to protect the care that this Court has ensured access to for almost two years now. *See* Dkt. 53 (granting expanded TRO protecting access to care for the class).

Dated: May 26, 2026

Respectfully submitted,

/s/ Emily Myrei Croston  
Emily Myrei Croston (ISB 12389)