

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

ALISHEA KINGDOM, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 1:25-cv-00691-RCL

**PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION, TO  
STAY AGENCY ACTION, AND FOR  
PROVISIONAL CLASS  
CERTIFICATION**

Plaintiffs Alishea Kingdom, Solo Nichols, and Jas Kapule, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and LCvR 65, hereby move the Court for a preliminary injunction enjoining Defendants, their contractors, employees, and agents i) from enforcing Executive Order 14168<sup>1</sup> as applied to medical care and accommodations for people in the custody of the Bureau of Prison (“BOP”) and from enforcing the BOP’s memoranda implementing Executive Order 14168, and ii) to provide and continue providing Plaintiffs and members of the proposed class gender-affirming hormone therapy and accommodations in accordance with BOP policy and practice immediately prior to Defendant Trump’s issuance of Executive Order 14168 on January 20, 2025. Additionally, pursuant to 5 U.S.C. § 705, Plaintiffs move for a stay of enforcement of BOP’s memoranda implementing Executive Order 14168. Furthermore, Plaintiffs move to provisionally certify the class as defined in Plaintiffs’ motion for class certification, *see* ECF 8, for the purpose of emergency relief. This motion is supported by the attached Memorandum of Points and Authorities; the Declarations of Dr. Dan H. Karasic, Dr. Cathy Thompson, Alishea Kingdom, Solo Nichols, and Jas Kapule, and attached exhibits; the Proposed Order; all pleadings and files of record; and any evidence that the Court may receive at

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<sup>1</sup> Exec. Order No. 14168, *Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, 90 Fed. Reg. 8615 (Jan. 20, 2025).

or before any hearing on this motion. Defendants oppose this motion.

Defendants oppose this motion. Pursuant to LCvR 7(f), Plaintiffs request an oral hearing on the motion.

Dated: March 17, 2025

Respectfully submitted,

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\*\* *Pro hac vice application forthcoming.*

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 17th day of March 2025, I served the foregoing PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION, TO STAY AGENCY ACTION, AND FOR PROVISIONAL CLASS CERTIFICATION by emailing a copy to Defendants' counsel, John Robinson, listed below. Mr. Robinson provided written consent to receive email service on behalf of Defendants on March 17, 2025.

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/s/ Michael Perloff  
Michael Perloff