

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

ALISHEA KINGDOM, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

No. 1:25-cv-00691-RCL

**PLAINTIFFS' MOTION FOR AN
UPDATED PRELIMINARY
INJUNCTION AND TO STAY AGENCY
ACTION**

Plaintiffs Alishea Kingdom, Solo Nichols, and Jas Kapule, on behalf of all Class Members, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and LCvR 65.1, hereby move the Court for a preliminary injunction enjoining Defendants, their contractors, employees, and agents i) from enforcing Executive Order 14168¹ as applied to medical care and social accommodations for people in the custody of the Bureau of Prisons (“BOP”) and from enforcing BOP’s Program Statement 5260.01, and ii) to provide and continue providing Plaintiffs and class members gender-affirming medications and social accommodations in accordance with BOP policy and practice in effect 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 Program Statement 5260.01. This motion is supported by the attached Memorandum of Points and Authorities; the Third Declaration of Dr. Dan H. Karasic; the Second Declaration of Dr. Cathy Thompson; the Declaration of Dr. Ole-Petter Hamnvik; the Third Declarations Plaintiffs Alishea Kingdom, Solo Nichols, and Jas Kapule; the Proposed Order; and any evidence that the Court may receive at or before any hearing on this motion.

Defendants oppose this motion.

¹ 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).

Dated: April 29, 2026

Respectfully Submitted,

/s/ Shana Knizhnik

Li Nowlin-Sohl (*pro hac vice*)
Leslie Cooper (*pro hac vice*)
Shana Knizhnik, D.D.C. Bar No. 120840
James D. Esseks (*pro hac vice*)
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Tel: 212-549-2500
lnowlin-sohl@aclu.org
lcooper@aclu.org
sknizhnik@aclu.org
jesseks@aclu.org

David C. Fathi (*pro hac vice*) *
Maria V. Morris, D.C. Bar. No. 1697904
Elisa C. Epstein (*pro hac vice*) *
American Civil Liberties Union Foundation
915 15th Street, N.W.
Washington, D.C. 20005
Tel: 202-393-4930
dfathi@aclu.org
mmorris@aclu.org
cepstein@aclu.org

Corene T. Kendrick (*pro hac vice*)
American Civil Liberties Union Foundation
425 California St., Ste. 700
San Francisco, CA 94104
Tel: 202-393-4930
ckendrick@aclu.org

Michael Perloff, D.C. Bar No. 1601047
Aditi Shah, D.C. Bar No. 90033136
ACLU Foundation of the District of Columbia
529 14th Street NW, Suite 722
Washington, D.C. 20045
Tel: 202-457-0800
mperloff@acludc.org
ashah@acludc.org

Shawn Thomas Meerkamper (*pro hac vice*)
Megan Z. F. Noor (*pro hac vice*)
Dale Melchert (*pro hac vice*)
Transgender Law Center
P.O. Box 70976
Oakland, CA 94612
Tel: 510-587-9696
shawn@transgenderlawcenter.org
megan@transgenderlawcenter.org
dale@transgenderlawcenter.org

Lynly S. Egyes (*pro hac vice*)
Transgender Law Center
594 Dean Street, Suite 11
Brooklyn, NY 11238
Tel: 510-587-9696
lynly@transgenderlawcenter.org

Counsel for Plaintiff Class

**Not admitted in D.C.; practice limited to federal courts.*