

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

JANE JONES, AMY JONES, BARBARA JONES,  
CARLA JONES, DONNA JONES,

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as  
Attorney General of the United States; WILLIAM  
LOTHROP, in his official capacity as Acting  
Director of the Federal Bureau of Prisons;

Defendants.

Civil Action No. 25-401-RCL

**PLAINTIFFS' EMERGENCY  
APPLICATION FOR A TEMPORARY  
RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Jennifer L. Levi\*\*

Sarah Austin\*

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& DEFENDERS**

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*Pro Bono Counsel for Plaintiffs*

\* *Pro Hac Vice*

\*\* *Admission Forthcoming*

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Wayne Fang\*

Markiana Julceus\*

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On Monday, March 3, 2025, or as soon as counsel may be heard, the undersigned attorneys for Plaintiffs Jane Jones, Amy Jones, Barbara Jones, Carla Jones, and Donna Jones (“Plaintiffs”), pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1(a) and (c), shall move before the United States District Court for the District of Columbia, at 333 Constitution Avenue N.W., Washington, D.C. 20001, for a temporary restraining order and preliminary injunction on an emergency basis to enjoin Defendants from enforcing Sections 4(a) and 4(c) of Executive Order 14168 titled “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government” and to maintain their current housing and medical treatment consistent with the status quo before January 20, 2025.

In support of their motion, Plaintiffs shall rely upon the attached letter brief, declaration of Amy Jones, declaration of Barbara Jones, declaration of Carla Jones, declaration of Donna Jones, declaration of Jennifer Fiorica Delgado, previously submitted declaration of Lauren Meade, M.D (ECF No. 21-04), supplemental declaration of Lauren Meade, M.D. (ECF No. 33-01), and a brief and reply brief previously filed in this case, (ECF Nos. 21-1 and 26). A proposed form of order is attached.

On February 26, 2025, the undersigned provided notice to Defendants that they will be making the enclosed application, and copies of all pleadings and papers filed in the action to date or to be presented to the Court at the hearing, will be provided to Defendants simultaneous with the filing on February 27, 2025, via email transmitted to their counsel, John J. Robinson, Esq.

WHEREFORE, Plaintiff respectfully requests that the Court enter a temporary restraining order and preliminary injunction prohibiting Defendants and their officers, employees, servants, agents, appointees, and successors from enforcing Sections 4(a) and 4(c) of Executive Order

14168, and requiring Defendants to maintain their current housing and maintain medical treatment consistent with the status quo before January 20, 2025.

Dated: February 27, 2025

Respectfully submitted,

/s/ Jennifer Fiorica Delgado

Jennifer Fiorica Delgado (Bar No. NY296)

Alexander Shalom (*admission forthcoming*)

Natalie Kraner (*admission forthcoming*)

Wayne Fang (*pro hac vice*)

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