

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

JANE JONES, et al.,

Plaintiffs,

v.

PAMELA J. BONDI, *in her official capacity*  
as Attorney General of the United States, *et*  
*al.*,

Defendants.

Case No.: 1:25-cv-00401-RCL

**PLAINTIFFS' UNOPPOSED MOTION FOR NEW PRELIMINARY  
INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs Jane Jones, Amy Jones, Barbara Jones, Carla Jones, and Donna Jones respectfully file this unopposed motion for entry of a new preliminary injunction as to all Defendants.

Plaintiffs rely on the concurrently filed memorandum of points and authorities, the Amended Complaint, the Plaintiffs' and expert declarations, and other documents filed in this action to support their requested relief. Pursuant to Local Civil Rule 7(m), undersigned counsel states that they have met and conferred with opposing counsel regarding this motion. Defendants have represented that they do not oppose this motion.

Because of Defendants' non-opposition and because the legal and factual issues are substantially similar to prior motions, Plaintiffs do not believe a hearing is necessary. If the Court desires one, Plaintiffs respectfully request that the Court schedule an expedited hearing before February 18, 2026.

Respectfully submitted,

Dated: February 2, 2026

*/s/ Jennifer Fiorica Delgado*

---

Jennifer Fiorica Delgado (Bar No. NY296)  
Alexander Shalom  
Natalie Kraner  
Wayne Fang (admitted *pro hac vice*)  
Markiana J. Julceus (admitted *pro hac vice*)  
LOWENSTEIN SANDLER LLP  
1251 Avenue of the Americas  
New York, NY 10020  
(862) 926-2029  
jdelgado@lowenstein.com  
ashalom@lowenstein.com  
nkraner@lowenstein.com  
wfang@lowenstein.com  
mjulceus@lowenstein.com

Jennifer L. Levi  
Sarah K. Austin (admitted *pro hac vice*)  
GLBTQ Legal Advocates & Defenders  
18 Tremont Street, Suite 950  
Boston, MA 02108  
(617) 426-1350  
jlevi@glad.org  
saustin@glad.org

Amy Whelan (admitted *pro hac vice*)  
Christopher F. Stoll (admitted *pro hac vice*)  
NATIONAL CENTER FOR LESBIAN RIGHTS  
1401 21st St.  
Ste #11548  
Sacramento, CA 95811  
(415) 365-1338  
[awhelan@nclrights.org](mailto:awhelan@nclrights.org)  
[cstoll@nclrights.org](mailto:cstoll@nclrights.org)

*Attorneys for Plaintiff*