

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, et al.,

Defendants.

CASE NO.

Defendants from enforcing the De Facto Placement Ban and any other policies, customs, or practices that have served as a moving force behind their actions denying Ms. Diamond protection from sexual assault or adequate gender dysphoria treatment.

The grounds for this Motion are set forth in the accompanying Memorandum of Law. Plaintiff also respectfully refers the Court to the Declaration of Ashley Diamond, the Declaration of Dr. Randi C. Ettner, the Declaration of James Aiken, the Declaration of Jammi Blake Duckworth, the Declaration of John Doe, and the Declaration of A. Chinyere Ezie, with attached exhibits, filed herewith. To the extent the Court seeks additional evidence before issuance of this Order, Plaintiff requests limited expedited discovery.

Plaintiff respectfully requests an evidentiary hearing on this Motion.

Dated: April 9, 2021

Respectfully submitted,

/s/ Elizabeth Littrell

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Counsel for Plaintiff Ashley Diamond
** Admitted Pro Hac Vice*

I hereby certify that on April 9, 2021, I electronically filed Plaintiff's Motion for Preliminary Injunction, supporting Memorandum of Law, and all accompanying Declarations and Exhibits thereto with the Clerk of the Court and all counsel of record using the CM/ECF system.

/s/ Maya G. Rajaratnam

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