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**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

REV. PAUL A. EKNES-TUCKER;  
BRIANNA BOE, individually and on behalf  
of her minor son, MICHAEL BOE; JAMES  
ZOE, individually and on behalf of his minor  
son, ZACHARY ZOE; MEGAN POE,  
individually and on behalf of her minor  
daughter, ALLISON POE; KATHY NOE,  
individually and on behalf of her minor son,  
CHRISTOPHER NOE; JANE MOE, Ph.D.;  
and RACHEL KOE, M.D.,

,

v.



absence of a TRO, (3) the equities weighing in favor of the Plaintiffs, and (4) that granting a TRO is in the public interest.

physical, emotional, psychological, and other harms for which there is no adequate remedy at law. The balance of hardships between the injuries Plaintiffs will suffer and Defendants' interests weigh in favor of granting Plaintiffs' motion to preserve the status quo

IT IS FURTHER ORDERED that the security requirement of Fed. R. Civ. P. 65(c) is waived and that this injunctive relief is effective upon service.

Done this \_\_\_ day of \_\_\_\_\_, 2022.

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

REV. PAUL A. EKNES-TUCKER;  
BRIANNA BOE, individually and on behalf  
of her minor son, MICHAEL BOE; JAMES  
ZOE, individually and on behalf of his minor  
son, ZACHARY ZOE; MEGAN POE,  
individually and on behalf of her minor  
daughter, ALLISON POE; KATHY NOE,  
individually and on behalf of her minor son,  
CHRISTOPHER NOE; JANE MOE, Ph.D.;  
and RACHEL KOE, M.D.,

,

v.

KAY IVEY, in her official capacity as  
Governor of the State of Alabama; STEVE  
MARSHALL, in his official capacity as  
Attorney General of the State of Alabama;  
DARYL D. BAILEY, in his official capacity  
as District Attorney for Montgomery County;  
C. WILSON BAYLOCK, in his official  
capacity as District Attorney for Cullman  
County; JESSICA VENTIERE, in her official  
capacity as District Attorney for Lee County;  
TOM ANDERSON, in his official capacity as  
District Attorney for the 12th Judicial Circuit;  
and DANNY CARR, in his official capacity

**[PROPOSED]  
PRELIMINARY  
INJUNCTION**

**[PROPOSED] PRELIMINARY INJUNCTION**

This matter having come before the Court upon the Motion for Preliminary Injunction filed by Reverend Paul A. Eknes-Tucker; Brianna Boe, individually and on behalf of her minor son, Michael Boe; James Zoe, individually and on behalf of his minor son, Zachary Zoe; Megan Poe, individually and on behalf of her minor daughter, Allison Poe; Kathy Noe, individually and on behalf of her minor son, Christopher Noe; Jane Moe, Ph.D.; and Rachel Koe, M.D. (collectively “Plaintiffs”); for good cause shown, it is hereby ORDERED that Plaintiffs’ Motion for Preliminary Injunction is GRANTED.

On April 7, 2022, the Alabama Legislature passed S.B. 184, known as the Vulnerable Child Compassion and Protection Act (“the Act”). On April 8, 2022, Governor Ivey signed the Act into law. It is scheduled to take effect on May 8, 2022.

The Act makes io.1 ( )JD4.4 0 Tw 0.66.6 ( Ac)12(se)12.1 (o)812. (f)3.7 (l)8.4 (im).3 (ll



The Court, having considered the pleadings, legal authority, and argument presented in support of Plaintiffs' Motion, as well as the sworn declarations submitted in support of that Motion, has found and concluded for the specific reasons required under Federal Rule of Civil Procedure 65(d) that Plaintiffs have demonstrated: (1) a likelihood of success on the merits, that they will suffer irreparable harm if a preliminary injunction is not granted, (3) that the balance of equities tip in Plaintiffs' favor, and (4) that a preliminary injunction is in the public interest.

Plaintiffs have established a likelihood of success on the merits of the claim.

