

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

JANE DOE,

Plaintiff,

v.

MASSACHUSETTS DEPARTMENT OF
CORRECTION; THOMAS A. TURCO III;
SEAN MEDEIROS; JAMES M. O’GARA JR.;
and STEPHANIE COLLINS,

Defendants.

Civil Action No. 1:17-CV-12255-RGS

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Jane Doe moves for the entry of a preliminary injunction pending an adjudication on the merits of this case, ordering Defendants to:

- (1) Transfer Jane Doe to MCI-Framingham;
- (2) Enjoin Defendants from using male correctional officers to conduct strip searches of Jane Doe, except in exigent circumstances;
- (3) Enjoin Defendants from forcing Jane Doe to shower in the presence of men and with a shower curtain that does not adequately cover her;
- (4) Enjoin Defendants from treating Jane Doe differently than other women held by the DOC;
- (5) Train all staff on how to appropriately accommodate, treat and communicate with individuals with Gender Dysphoria within 60 days of this Order;
- (6) Enjoin Defendants from using male pronouns when speaking to or about Jane Doe;

- (7) Enjoin Defendants from referring to Jane Doe by her former male name (or any abbreviated version thereof);
- (8) Refer to Jane Doe by her chosen female name; and
- (9) Award such other and further relief as is just and proper.

In support of this motion, Plaintiff respectfully refers the court to the following contemporaneously filed documents:

- (1) Memorandum of Law in Support of Plaintiff Jane Doe's Motion for Preliminary Injunction;
- (2) Affidavit of Jane Doe;
- (3) Affidavit of Dr. Randi Ettner; and
- (4) Affidavit of James Aiken.

/s/ J. Anthony Downs

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Dated: February 2, 2018

LOCAL RULE 7.1(A)(2) CERTIFICATION AND CERTIFICATE OF SERVICE

I, J. Anthony Downs, hereby that counsel for Plaintiff has conferred in good faith with opposing counsel regarding this motion but were unable to narrow the issues.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on February 2, 2018.

/s/ J. Anthony Downs