

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JESSICA HICKLIN,

Plaintiff,

v.

ANNE PRECYTHE,

et al.,

Defendants.

Case No. 4:16-CV-01357-NCC

**NOTICE OF ERRATA AND CORRECTION TO REPLY MEMORANDUM OF LAW IN
SUPPORT OF
PLAINTIFF’S MOTION FOR DECLARATORY RELIEF AND A PERMANENT
INJUNCTION**

PLEASE TAKE NOTICE that page 5 of Plaintiff’s Reply Memorandum of Law in Support of her Motion for Declaratory Relief and a Permanent Injunction filed on April 12, 2018 (Doc. 170) contained an error in the citation sentence immediately preceding the “Argument” section.

The correct sentence should read as follows:

“Doc. 64-4 at 8, 10; Doc. 64-6 at 5, 6, 12, 13, 33-39; Doc. 68-8 at 10; Doc. 164-13 at 3, 5; Ex. S to 2d Gordon Decl., Atterberry Depo. at 143:11-144:14; Doc. 164-2, Corizon 30(b)(6) Depo. at 108:5-23, 113:1-16; Doc. 164-9 at Hicklin v. Lombardi 00941-945; Ex. T to 2d Gordon Decl., Corizon 30(b)(6) Depo. at 157:18-160:4, 188:2-14; *see also* Ex. Q to 2d Gordon Decl., Brown Depo at 96:22-97:10, 288:22-289:4, 289:12-21.”

A corrected page 5 is filed as an attachment to this notice.

Respectfully submitted this 13th day of April 2018.

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing Notice of Errata and Correction to Reply Memorandum of Law in Support of Plaintiff's Motion for Declaratory Relief and a Permanent Injunction was made on April 13, 2018 via the Court's CM/ECF system to:

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these treatments. Doc. 164-8 at GF 0046, 0151, 0155; Doc. 64-6 at 31-32; Ex. T to 2d Gordon Decl., Corizon 30(b)(6) Depo. at 157:18-160:4, 188:2-14. They did this despite knowing that Ms. Hicklin's facial and body hair and lack of access to feminine underwear and other gender-affirming canteen items cause her great distress, and that the freeze-frame policy barred her from receiving hormone therapy. Doc. 64-4 at 8, 10; Doc. 64-6 at 5, 6, 12, 13, 33-39; Doc. 68-8 at 10; Doc. 164-13 at 3, 5; Ex. S to 2d Gordon Decl., Atterberry Depo. at 143:11-144:14; Doc. 164-2, Corizon 30(b)(6) Depo. at 108:5-23, 113:1-16; Doc. 164-9 at Hicklin v. Lombardi 00941-945; Ex. T to 2d Gordon Decl., Corizon 30(b)(6) Depo. at 157:18-160:4, 188:2-14; *see also* Ex. Q to 2d Gordon Decl., Brown Depo at 96:22-97:10, 288:22-289:4, 289:12-21.

ARGUMENT

Neither MDOC nor Corizon offered any arguments in opposition to Ms. Hicklin's Motion for Declaratory Relief and a Permanent Injunction. Thus, Ms. Hicklin points the Court to the arguments contained in her opening brief in support of this motion (Doc. 164) and the briefs submitted in support of her previous Motion for Preliminary Injunction (Docs. 64 and 70). Ms. Hicklin also points the Court to the findings of fact and conclusions of law contained in its February 9, 2018 Memorandum and Order. Doc. 145; *Hicklin v. Precynthe*, No. 4:16-CV-01357-NCC, 2018 WL 806764 (E.D. Mo. Feb. 9, 2018).

CONCLUSION

For reasons stated herein and in her opening Memorandum of Law (Doc. 164), Ms. Hicklin respectfully requests that this Court grant her Motion for Declaratory Relief and a Permanent Injunction.