

Adree Edmo
IDOC # 94691
P.O. Box 14
Boise, ID 83707
Plaintiff

Case No: _____ Inmate Name: Adree Edmo
Date: 04/06/2017 Inmate IDOC#: 94691
Document Title: Plaintiff's Motion For Temporary Re-
straining order & Preliminary Injunction
Total Pages: 2 Inmate Initials Verifying Page Count: _____
Document(s) 1 of 2 AE

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF IDAHO

ADREE EDMO,
Plaintiff
v.
IDAHO STATE BOARD
OF CORRECTIONS, et. al.,
Defendants

Case Number
PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION ORDER

ADREE EDMO, Plaintiff in above entitled matter, moves this Court to GRANT the following order to show Cause and Temporary Restraining Order ("TRO") based on accompanying Order to show Cause and Temporary Restraining Order; Declaration in Support of TRO and Preliminary Injunction; and Memorandum of Law in Support of Motion for TRO and Preliminary Injunction.

DATED this 30th day of March 2017.

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION ORDER -
PG. 1


ADREE EDMO, PLAINTIFF

CERTIFICATE OF SERVICE

I, ADREE EDMO, hereby certify I placed a true and correct copy of PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION ORDER into ISCI's Legal Resource's Center for processing into the U.S. Mail addressed to the following:
Dated this 30th day of March, 2017.

[X] U.S. District Court
James A. McClure Fed. Bldg. Courthouse
550 Front St.
Boise, ID 83724


ADREE EDMO, PLAINTIFF

Adree Edmo
IDOC #94691
P.O. Box 14
Boise, ID 83707-0014
Plaintiff

Case No: _____ Inmate Name: Adree Edmo
Date: 04/06/2017 Inmate IDOC#: 94691
Document Title: Plaintiff's Affidavit in Support of Motion for Temporary Restraining Order
Total Pages: 5 Inmate Initials Verifying Page Count: AE
Document(s) 1 of 5

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF IDAHO

ADREE EDMO,
Plaintiff,
v.
IDAHO STATE BOARD OF
CORRECTIONS, et. al.,
Defendants

Case Number _____
PLAINTIFF'S AFFIDAVIT
IN SUPPORT OF MOTION
FOR TEMPORARY RESTRAIN-
ING ORDER AND PRE-
LIMINARY INJUNCTION

STATE OF IDAHO
County of Ada | Affidavit of Adree Edmo

ADREE EDMO, first being duly sworn upon,
deposes and says as follows:
i. I am the plaintiff in this case. I make this affidavit
in support of my motion for TRO and a Preliminary

PLAINTIFF'S AFFIDAVIT IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIM-
INARY INJUNCTION - 1

Injunction to ensure I receive necessary and adequate medical treatment required under the provisions of the Eighth Amendment of Cruel and Unusual Punishment (Inadequate Medical Care), as incorporated by Fourteenth Amendment of the United States Constitution.

2. As set forth in the Complaint in this case, I was not, and am not, provided necessary and adequate medical care of appropriate Cross-Sex Hormonal Therapy, The "Real-life" experience of living full-time as a female, according to established ("WPATH") Standards of Care, and Sex Reassignment Surgery ("SRS").

3. On two occasions: 09/29/2015, I, first attempted to self-castrate myself, right testicle with a razor blade at the Idaho State Correctional Institution, following, and subsequently on 12/31/2016, the second attempt at self-castrating my right testicle with a razor blade by completely cutting the scrotal sac, and pulling out the entire right testicle resulting in being transported via ambulance to Boise's St. Alphonsus Medical Center for surgery to attempt to repair testicle.

4. Upon arrival back at the Idaho State Correctional Institution ("ISCI"), ISCI's physician's

PLAINTIFF'S AFFIDAVIT IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 2

have not and will not provide me any further medical treatment for exacerbating symptoms of Gender Dysphoria ("GD"), only still offering Cross-Sex Hormonal Therapy "per IDOC policy," and nothing further based on individual basis.

5. Such medical treatment is not individualized or based on my particular medical risk profile, but due to contractual agreements between Defendants IDOC and Corizon Health Services, and financial restraints.

6. Other offenders diagnosed with other mental health disorders other than Gender Dysphoria are treated, regardless if such offender had diagnosis prior to incarceration, and upon notification of having disorder other than Gender Dysphoria ("GD").

7. I am denied adequate and appropriate medical care for GD because of my membership of a suspect class, namely, the Class of inmates with GD. There is no rational penological reason for denial of appropriate and adequate medical care.

For the reasons set forth in the Plaintiff's memorandum of law filed subsequently with this

PLAINTIFF'S AFFIDAVIT IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 3

affidavit, the Plaintiff is entitled to a TRO requiring Defendants to arrange for an individualized medical examination, and a plan of treatment by a qualified, prudent, specialist with substantial experience and/or expertise in treating individuals with gender dysphoria, and to a preliminary injunction requiring the Defendants to carry out that plan of treatment by such specialist.

For the foregoing reasons, the Court should GRANT the Plaintiff's motion in all respects.

DATED this 30th day of March 2017.

Adree Edmo 04/06/2017 AE
Adree Edmo, Plaintiff

SUBSCRIBED AND SWORN TO BEFORE ME

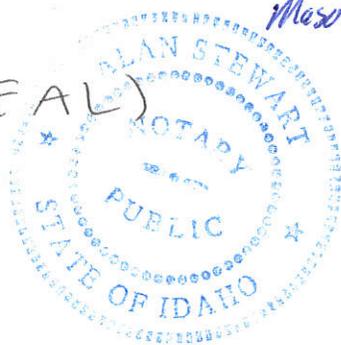
This 6 day of April 2017.

[Signature]
Notary For Idaho

[Signature]
Commission Expires

Mason Edmo AKA Adree Edmo

(SEAL)



PLAINTIFF'S AFFIDAVIT IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION-4

CERTIFICATE OF SERVICE

I, ADREE EDMO, Certify I mailed a true and correct copy of PLAINTIFFS AFFIDAVIT OF SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION ORDER within the ISCI's Legal Resource Centers' mail for processing via U.S. mail addressed to following address:

Dated This 30th day of March 2017.

[X] U.S. District Court
James A. McClure Fed. Bldg. / Courthouse
550 Fort Street
Boise, ID 83724
A. Edmo
Adree Edmo, Plaintiff

PLAINTIFFS AFFIDAVIT IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION - 5

ADREE EDMO
IDOC# 94691
P.O. Box 14
Boise, ID 83707-0014
Plaintiff

Case No: _____ Inmate Name: Adree Edmo
Date: 04/06/2017 Inmate IDOC#: 94691
Document Title: Order to Show Cause & Temporary Restraining Order
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Document(s) 1 of 3

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF IDAHO

Adree Edmo,
Plaintiff
v.
IDAHO STATE BOARD
OF CORRECTIONS,
et al.,
Defendants

Case Number _____

ORDER TO SHOW CAUSE
AND TEMPORARY
RESTRAINING ORDER

upon the supporting affidavit of the Plaintiff and the accompanying memorandum of law, it is,

ORDERED, Defendants Young, Eliason, Whinnery, Siegert, Kempf (including successors) in office) show cause in room _____ of the United States Courthouse, James A. McClure Federal Building Courthouse, 550 Fort Street, Boise, Idaho 83724, on _____ day of _____, 2017, at _____ o'clock why preliminary injunction should

ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER - 1

not issue pursuant to Rule 65(a), Fed. R. Civ. P., enjoining said Defendants, their successors in office, agents, servants, and employees and all other persons acting in concert and participation with them, to provide medically appropriate treatment of cross-sex Hormonal Therapy, the "real-life" experience of living fulltime in the female gender, and sex reassignment surgery ("SRS") by a competent, experienced, prudent, licensed surgeon to the Plaintiff designed to restore and maintain full function of Plaintiff.

IT IS FURTHER ORDERED, effective immediately, and pending the hearing of this order to show cause, Defendants Young, Eliason, Whinnery, Yordy, Siebert and Kempf (including successor(s) in office), shall arrange for the Plaintiff to be examined by a qualified, licensed, prudent MD specialist with substantial experience and/or expertise in gender dysphoria, and to obtain from that specialist a evaluation for the medically necessary surgery of sex reassignment surgery, and/or the appropriate medical therapy to restore plaintiff to acceptable, full function of life.

IT IS STILL FURTHER ORDERED, that this order

ORDER TO SHOW CAUSE AND TEMPORARY
RESTRAINING ORDER - 2

to show cause, and all other papers attached to this application, shall be served on Defendants, Young, Ellason, Whinnery, Yordy, Siegert and Kempf (including successor(s) in office) by _____ 2017, and the U.S. Marshals Service is hereby directed to effectuate such service.

Dated ~~30th~~ this month of ~~March~~ ^{04/06/2017} ~~2017~~.

U.S. District Judge

CERTIFICATE OF SERVICE

I, ADREE EDMO, CERTIFY, I placed a true and correct copy of ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER into the ISCI's Legal Resource Center's mail for processing into the U.S. Mail addressed to: Date of: ~~03/30/2017~~
04/06/2017

U.S. District Court
James A. McClure Fed. Bldg./Courthouse
550 Fort Street
Boise, ID 83724

A. Edmo
Adree Edmo, Plaintiff

ORDER TO SHOW CAUSE AND TEMPORARY RESTRAINING ORDER - 3