

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CRISTINA NICHOLE IGLESIAS
(a.k.a. CRISTIAN NOEL IGLESIAS),

Plaintiff,

v.

IAN CONNORS, *et al.*,

Defendants.

Case No. 19-cv-00415-NJR

Judge Nancy J. Rosenstengel

**PLAINTIFF’S RESPONSE TO DEFENDANTS’ EXPEDITED MOTION FOR
PARTIAL RECONSIDERATION OF PRELIMINARY INJUNCTIVE RELIEF**

On December 27, 2021, this Court ordered preliminary injunctive relief for Plaintiff Cristina Nichole Iglesias. ECF No. 176; ECF No. 177. Defendants now move for partial reconsideration of a discrete portion of that relief. ECF No. 178. Specifically, Defendants seek reconsideration of the Court’s order (i) to schedule a court reporter to transcribe the upcoming meeting of their Transgender Executive Council (TEC) and (ii) to provide that transcript to the Court if Ms. Iglesias’s request for gender-affirming surgery is not approved. *Id.* at 1; *see* ECF No. 177 at 1, 3.

Defendants argue that this portion of the ordered relief is barred by deliberative-process privilege, the Prison Litigation Reform Act, and “separation-of-powers principles.” ECF No. 178 at 4-11. Plaintiff disagrees that any of Defendants’ arguments is correct as a matter of law and believes that this Court was well within its discretion in ordering such relief. However, to the extent Defendants have offered to provide a sworn declaration from a member of the TEC explaining the reasons for the Council’s decision if the TEC does not recommend Plaintiff for gender-affirming surgery, *id.* at 2, Plaintiff does not oppose Defendants’ present motion.¹

Plaintiff does not oppose due to her pressing concern that any appeal by Defendants of this Court’s order could result in further denial of the medical treatment she so desperately needs.

¹ Plaintiff reserves the right to object to any future invocation of Defendants’ deliberative-process, Prison Litigation Reform Act, and separation-of-powers arguments in this litigation.

Dated: January 19, 2022

Respectfully submitted,

/s/ John A. Knight

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CERTIFICATE OF SERVICE

I certify that on January 19, 2022, I electronically filed the foregoing document with the Clerk of this Court by using the CM/ECF system, which will accomplish service through the Notice of Electronic Filing for parties and attorneys who are Filing Users.

Dated: January 19, 2022

/s/ John A. Knight
John A. Knight