

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

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

Plaintiff,

v.

FEDERAL BUREAU OF PRISONS, *et al.*,

Defendants.

Case No. 19-cv-00415-NJR

Judge Nancy J. Rosenstengel

**PLAINTIFF’S MOTION FOR LEAVE TO SUPPLEMENT
MOTION TO MODIFY PRELIMINARY INJUNCTION**

Plaintiff Cristina Nichole Iglesias, by undersigned counsel, files this motion to supplement her Motion to Modify the Preliminary Injunction, ECF No. 213 (“Motion”), pursuant to Fed. R. Civ. P. 15(d).

On March 4, 2022, Plaintiff filed her Motion; Defendants filed their Response to Plaintiff’s Motion to Modify Preliminary Injunction on March 12, 2022, ECF No. 222; and on March 16, 2022, Plaintiff filed her Reply in Support of Her Motion for a Modified Preliminary Injunction, ECF No. 225.

Since Plaintiff filed her Reply, she has become aware that BOP’s “Surgeon 1,” with whom BOP scheduled Ms. Iglesias to have a vaginoplasty consultation on April 7, 2022, does not in fact perform vaginoplasties. Plaintiff seeks to supplement her Motion with this new information regarding Surgeon 1, described in more detail in Exhibit A, Plaintiff’s Sealed Reply to Defendants’ April 8 Update and accompanying declarations, ECF Nos. 234, 234-1, 234-2, 234-3.

Accordingly, Plaintiff moves this Court for leave to supplement her Motion to Modify the Preliminary Injunction with Exhibit A, pursuant to Fed. R. Civ. P. 15(d).

Dated: April 15, 2022

Respectfully submitted,

/s/ Frank Battaglia

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Attorneys for Plaintiff Cristina Nichole Iglesias

CERTIFICATE OF SERVICE

I certify that on April 15, 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: April 15, 2022

/s/ Frank Battaglia
Frank Battaglia