

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

ROCHELLE GARZA, as guardian ad litem to )  
unaccompanied minor J.D., on behalf of )  
herself and others similarly situated, *et al.*, )  
) )  
Plaintiffs, )  
) )  
v. )  
) )  
ERIC D. HARGAN, *et al.*, )  
) )  
Defendants. )  
\_\_\_\_\_ )

No. 17-cv-02122-TSC

**APPLICATION FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1, Plaintiff Jane Moe hereby applies for the issuance of an order temporarily restraining Defendants (along with their respective successors in office, officers, agents, servants, employees, attorneys and anyone acting in concert with them) from, *inter alia*, interfering with or obstructing Ms. Moe’s access to abortion; forcing, coercing, or requiring Ms. Moe to obtain additional “counseling” from an anti-abortion entity, including a crisis pregnancy center or “pregnancy resource center” either before or after her abortion; forcing, coercing, or requiring Ms. Moe to notify anyone of her abortion decision, either before or after her abortion; disclosing Ms. Moe’s abortion decision themselves, either before or after their abortions, to her family or potential sponsors; coercing or attempting to “persuade” Ms. Moe to carry her pregnancy to term; or retaliating against Ms. Moe and any shelter staff who assist her based on her decision to have an abortion and the shelter staff’s assistance, respectively.

This motion is based on the memorandum of points and authorities submitted herewith, all declarations, pleadings and filings filed in this action. The grounds for this application are

that Defendants' actions and policies violate Ms. Moe's rights under the First and Fifth Amendments to the Constitution of the United States, insofar as these actions and policies unlawfully violate Ms. Moe's rights to privacy, liberty and informational privacy, and rights against compelled speech; that Ms. Moe will suffer irreparable injury if the Defendants are not enjoined; that Defendants will not be injured if a temporary restraining order issues; and that the public interest favors the issuance of a temporary restraining order.

Given the Court's familiarity with the issues presented in the TRO, and given that time is of the essence, Plaintiffs respectfully request that this Court decline to hold oral argument. Of course, should the Court decide argument is helpful, Plaintiffs' counsel will make themselves available at any time.

January 11, 2018

Respectfully submitted,

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