

IN THE SEVENTH JUDICIAL DISTRICT  
DOUGLAS COUNTY DISTRICT COURT  
CIVIL DEPARTMENT

LILY LOE, by and through her parent and next friend Lisa Loe; LISA LOE; RYAN ROE, by and through his parent and next friend Rebecca Roe; REBECCA ROE,

*Plaintiffs,*

v.

STATE OF KANSAS, *ex rel* KRIS KOBACH, Attorney General,

*Defendants.*

Case No. \_\_\_\_\_  
Div. No. 7

**PLAINTIFFS' MOTION FOR TEMPORARY INJUNCTION**

Plaintiffs Lily Loe, by and through her parent and next friend Lisa Loe; Lisa Loe; Ryan Roe, by and through his parent and next friend Rebecca Roe; and Rebecca Roe, by and through their undersigned attorneys, respectfully move this Court for a temporary injunction prohibiting the enforcement of S.B. 63's prohibitions on providing puberty blockers or hormone therapy, specifically in Sections 3(a)(2), 3(a)(3), 3(b)(2), and 3(b)(3). As set forth more fully in Plaintiffs' contemporaneously filed brief and accompanying declarations, Plaintiffs have demonstrated a substantial likelihood of prevailing on the merits, a reasonable probability of irreparable injury without an injunction, a lack of adequate legal remedy, that the threat of injury to Plaintiffs outweighs whatever harm the injunction may cause Defendants, and that the injunction will not be against the public interest. *See Hodes & Nauser, MDs, P.A. v. Schmidt*, 309 Kan. 610, 619 (2019).

A proposed order granting the motion is attached as Exhibit A.

WHEREFORE, Plaintiffs respectfully request that this Court grant their Motion and temporarily enjoin S.B. 63 § 3(a)(2), 3(a)(3), 3(b)(2), and 3(b)(3).

Respectfully submitted, this 28<sup>th</sup> day of May, 2025.

By: /s/   
\_\_\_\_\_  
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ATTORNEYS FOR PLAINTIFFS

\**Pro Hac Vice* application forthcoming