

ELECTRONICALLY FILED
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CLERK OF THE DOUGLAS COUNTY DISTRICT COURT
CASE NUMBER: DG-2025-CV-000241
PII COMPLIANT
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 28th day of May, 2025.

By: /s/ 
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**Pro Hac Vice* application forthcoming