

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

CHELSEA ELIZABETH MANNING,

Plaintiff,

v.

CHUCK HAGEL, *et al.*,

Defendants.

Civ. No. _____

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65, Plaintiff Chelsea Manning moves for the issuance of a preliminary injunction requiring Defendants to provide Plaintiff with clinically appropriate treatment under the *Standards of Care for the Health of Transsexual, Transgender, and Gender-Nonconforming People* developed by the World Professional Association for Transgender Health, including, but not limited to, (1) providing hormone therapy for Plaintiff’s gender dysphoria; (2) permitting Plaintiff to express her female gender by following female grooming standards, including dress and hair length; and (3) providing Plaintiff with treatment by a clinician who is qualified to treat gender dysphoria.

The grounds for this motion are that the denial of such treatment violates Plaintiff’s rights under the Eighth Amendment to the Constitution, that the denial of such treatment is causing her irreparable injury and will continue to cause her irreparable injury, that providing such treatment will not harm the defendants, and that the public interest favors upholding the Constitution, including by providing necessary medical treatment to persons confined in correctional institutions.

In support of this application, Plaintiff respectfully refers the Court to the Complaint, the Memorandum in Support of Plaintiff’s Motion for Preliminary Injunction, the Declaration of

Chelsea Elizabeth Manning, the Declaration of Dr. Randi C. Ettner, and the Declaration of Chase B. Strangio.

Plaintiff respectfully requests oral argument on this motion.

A proposed order is attached.

September 23, 2014

Respectfully submitted,

/s/ Arthur B. Spitzer
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