

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ENNUI
GRACELAND DIVISION

JANE DOE,

:

Plaintiff,

:

vs.

:

Docket No. _____

REUBEN STEELE, M.D., et al.,

:

Defendants.

:

MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiff Jane Doe, by and through her undersigned attorney, moves this Honorable Court for a Temporary Restraining Order requiring disclosure of medical records in Defendants' possession. In support of this Motion, which is also based on the Verified Complaint filed in this matter, Plaintiff states:

1. She will suffer immediate and irreparable harm as set out in her Verified Complaint if this Motion is denied.
2. She has no plain and adequate remedy at law.
3. She is likely to prevail on the merits of the action she has filed.
4. It will not harm Defendants to provide access to the medical records.
5. Plaintiff is unable to provide security in this matter because of her poverty; her only source of income is weekly earnings in the amount of \$180.25.
6. These grounds are set out more fully in Plaintiff's Memorandum submitted herewith.

WHEREFORE, Plaintiff asks that this Court enter an order, without the requirement of security, requiring Defendants to turn over to her the results of Richard Roe's blood test for the AIDS virus.

DATED: This Month, 200X

A. FINCH
Brennan County Legal Services
ATTORNEY FOR PLAINTIFF

H:\Training\CORT BLST\2002\Tromtn.wpd

NOTICE OF MOTION

To: Reuben Steele, M.D.
Mary Irons
Edward Derwinski

Please take notice that the undersigned will bring the above Motion on for hearing at the United States District Court for the Western District of Ennui, Graceland Division, located at 95 Main Street, Graceland, Ennui, on the _____ day of _____, 200X, at _____ a.m./p.m., or as soon thereafter as counsel may be heard.

DATED: This Month, 200X

A. FINCH
Attorney for Plaintiff

H:\Training\CORT BLST\2002\Tromn.wpd