

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

COLE ROBINSON, et al. v. RAUL LABRADOR, et al.

Robinson v. Labrador · No. 1:24-cv-00306-DCN · Decided February 27, 2026

SUMMARY

The United States District Court for the District of Idaho granted Plaintiffs’ seventh motion for a preliminary injunction in a putative class action challenging Idaho Code § 18-8901 as applied to incarcerated individuals receiving hormone therapy. The court concluded that Plaintiffs continued to present a serious question regarding their Eighth Amendment claims, faced irreparable harm, and satisfied the balance-of-equities, public-interest, and Prison Litigation Reform Act requirements. The injunction prohibits enforcement of the statute’s prohibition on using state funds to provide hormone therapy to the certified class for 90 days beginning March 2, 2026.

CASE DETAILS

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| COURT                 | United States District Court for the District of Idaho                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| WRITING FOR THE COURT | David C. Nye                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the District of Idaho                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| DECIDED               | February 27, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| DOCKET                | 1:24-cv-00306-DCN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| PROCEDURAL POSTURE    | Plaintiffs moved for a seventh preliminary injunction in their putative class action challenging Idaho Code § 18-8901. The district court granted the motion without oral argument and issued a preliminary injunction effective for 90 days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| STANDARD OF REVIEW    | To obtain a preliminary injunction, plaintiffs must show a likelihood of success on the merits, likely irreparable harm, that the balance of equities favors relief, and that an injunction is in the public interest. When the government opposes the injunction, the balance-of-equities and public-interest factors merge. The Ninth Circuit permits a sliding-scale approach under which a sufficiently strong showing on one factor may offset a weaker showing on another; a serious question on the merits may suffice when the balance of hardships tips sharply in plaintiffs' favor and the other requirements are met. Under the PLRA, prison-condition injunctions must be narrowly drawn, extend no |

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|---------------------------|----------------------------------------------------------------------------------------------|
|                           | further than necessary, and be the least intrusive means necessary to correct the violation. |
| <b>PRECEDENTIAL VALUE</b> | nonprecedential                                                                              |
| <b>PARTIES</b>            | Cole Robinson, et al. v. Raul Labrador, et al.                                               |

## TOPICS

injunctions   cruel and unusual punishment   prisoners rights   section 1983   class actions

## PRACTICE AREAS

civil rights   constitutional law   prisoners' rights   health law   civil procedure

## QUESTIONS PRESENTED

1. Whether plaintiffs continued to raise a serious question going to the merits of their Eighth Amendment challenge to Idaho Code § 18-8901.
2. Whether plaintiffs showed likely irreparable harm, a favorable balance of equities, and that a preliminary injunction would serve the public interest.
3. Whether the Prison Litigation Reform Act permitted the court to issue a successive preliminary injunction after the prior injunction expired and whether the continued relief satisfied the PLRA's needs-narrowness-intrusiveness requirements.

## HOLDINGS

1. Plaintiffs continued to present a serious question as to whether enforcing Idaho Code § 18-8901 to deny hormone therapy to eligible incarcerated persons with gender dysphoria violates the Eighth Amendment.
2. Plaintiffs satisfied the preliminary-injunction requirements because they presented a serious question on the merits, showed likely irreparable physiological and psychological harm, and established that the balance of equities and public interest favored continued relief.
3. The court could issue a successive preliminary injunction after the prior preliminary injunction expired; it could not merely extend the initial injunction without making the relief final.
4. The seventh preliminary injunction satisfied the PLRA because it was narrowly drawn, extended no further than necessary, and used the least intrusive means necessary to protect the class members' rights.

## KEY QUOTATIONS

*“Reading these two cases together, the Court can enter a successive preliminary injunction, but it cannot extend its initial order without making it final after reaching the requisite findings.”* (at 3)

*“The injunction remains narrowly drawn to only a small group of affected individuals receiving one type of gender-affirming treatment.”* (at 8)

*“This Order simply allows the class members to continue to receive medication until the Court can make a final, informed decision in this case.” (at 9)*

## FACTUAL BACKGROUND

Idaho Code § 18-8901 prohibits the use of public funds for medical interventions intended to affirm an individual's gender identity when inconsistent with biological sex. Plaintiff Katie Heredia is a transgender woman incarcerated in an Idaho Department of Corrections facility and is a member of a certified class of incarcerated persons with gender dysphoria who receive or would receive hormone therapy. The court previously found a serious question concerning whether denying otherwise lawful hormone therapy to incarcerated persons could constitute cruel and unusual punishment and had repeatedly enjoined enforcement of the statute as to eligible class members. Plaintiffs presented evidence that discontinuing hormone therapy could cause severe physiological and psychological harm.

## PROCEDURAL HISTORY

Plaintiff Katie Heredia, whose legal name is Cole Robinson, filed a putative class action alleging that Idaho Code § 18-8901 violates the Eighth Amendment and 42 U.S.C. § 1983 by denying incarcerated persons with gender dysphoria access to hormone therapy. The court previously certified the proposed class and issued six successive preliminary injunctions; each prior injunction was subject to the Prison Litigation Reform Act's 90-day expiration provision. Plaintiffs sought a seventh injunction before the sixth expired, and the court granted the motion, continuing the existing relief for another 90 days.

## DISPOSITION

other

## CASES CITED

- *Yakama Indian Nation v. State of Washington Department of Revenue*, 176 F.3d 1241, 1246 (9th Cir. 1999)
- *Mayweathers v. Newland*, 258 F.3d 930, 936 (9th Cir. 2001)
- *Ahlman v. Barnes*, 20 F.4th 489, 494 (9th Cir. 2021)
- *Alliance for the Wild Rockies v. Petrick*, 68 F.4th 475, 490–91, 497 (9th Cir. 2023)
- *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20, 22–23 (2008)
- *Poretti v. Dzurenda*, 11 F.4th 1037, 1047 (9th Cir. 2021)
- *Fellowship of Christian Athletes v. San Jose Unified School District Board of Education*, 82 F.4th 664, 684 (9th Cir. 2023)
- *Barsky v. Board of Regents of University of the State of New York*, 347 U.S. 442, 449–52 (1954)
- *Snipes v. DeTella*, 95 F.3d 586, 592 (7th Cir. 1996)
- *Gordon v. County of Orange*, 6 F.4th 961, 970 (9th Cir. 2021)
- *Armstrong v. Schwarzenegger*, 622 F.3d 1058, 1071 (9th Cir. 2010)

