

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

Civil Action No. 22-cv-2287-GPG-STV

KALEY CHILES,

Plaintiff,

v.

PATTY SALAZAR, in her official capacity as Executive Director
of the Department of Regulatory Agencies; *et al.*,

Defendants.

STIPULATED ORDER FOR PRELIMINARY INJUNCTION

Under Federal Rules of Civil Procedure 65, Plaintiff and Defendants jointly stipulate to the following preliminary injunction:

1. During the pendency of this case until the district court issues a final judgment, Defendants, their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of this order are enjoined from enforcing Colo. Rev. Stat. § 12-245-224(1)(t)(V) against Plaintiff's practice of talk-only licensed professional counseling and addiction counseling.
2. During the pendency of this case until the district court issues a final judgment, Defendants, their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of this order are enjoined from requiring Plaintiff

to respond to licensing complaints filed with the Division of Professions and Occupations raising allegations that Plaintiff's talk-only practice of licensed professional counseling and addiction counseling violate Colo. Rev. Stat. § 12-245-224(1)(t)(V).

Plaintiff need not provide any security for this stipulated preliminary injunction.

This stipulation is without prejudice to the respective legal positions of the parties and does not waive any argument or right to request modifications or clarifications of the injunction as the parties may deem appropriate in the future.

Respectfully submitted this 1st day of June, 2026.

WE SO STIPULATE:

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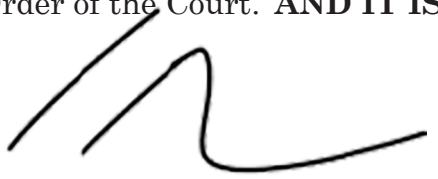
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In light of the parties' stipulations and agreement, the Court hereby adopts this Stipulated Preliminary Injunction as an Order of the Court. **AND IT IS SO ORDERED.**

Dated: June 2nd, 2026



Hon. Gordon P. Gallagher
United States District Judge