

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GORDON SCHIFF and CELESTE ROYCE,

Plaintiffs,

v.

**U.S. OFFICE OF PERSONNEL
MANAGEMENT; CHARLES EZELL**, in his
official capacity as Acting Director of the U.S.
Office of Personnel Management; **U.S.
DEPARTMENT OF HEALTH & HUMAN
SERVICES; ROBERT F. KENNEDY, JR.**, in
his official capacity as Secretary of Health and
Human Services; **AGENCY FOR
HEALTHCARE RESEARCH AND
QUALITY**; and **MAMATHA PANCHOLI**, in
her official capacity as Acting Director of the
Agency for Healthcare Research and Quality,

Defendants.

Case No. 25-cv-10595-LTS

**PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

To implement Executive Order 14168, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government,” 90 Fed. Reg. 8615 (Jan. 30, 2025) and U.S. Office of Personnel Management memorandum titled “Initial Guidance Regarding President Trump’s Executive Order Defending Women,” Defendants have adopted and implemented a policy of removing from government-run forums private speech containing certain banned words, including “transgender,” “nonbinary,” “gender identity” and “LGBTQ” (the “Policy”). As a result of the Policy, Defendants removed Plaintiffs’ patient safety research from the Patient Safety Network (“PSNet”) web forum.

The grounds for this Motion are set forth in the accompanying memorandum of law and the proposed relief is set forth in the accompanying proposed order.

REQUEST FOR ORAL ARGUMENT

Plaintiffs respectfully request oral argument on this Motion.

April 1, 2025

Respectfully submitted,

/s/ Scarlet Kim

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Although counsel for Defendants have not yet formally entered an appearance in this case, I, Scarlet Kim, hereby certify that in accordance with Local Rule 7.1(a)(2), Plaintiffs' counsel conferred with counsel who will be representing Defendants via email on March 31, 2025, and they indicated that Defendants oppose the motion.

/s/ Scarlet Kim
Scarlet Kim

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2025, a true copy of the foregoing will be electronically filed with the Clerk of Court using the Cm/ECF system, which will then send a notification of such filing (NEF).

/s/ Scarlet Kim
Scarlet Kim