

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

DOCTORS FOR AMERICA,

Plaintiff,

v.

OFFICE OF PERSONNEL
MANAGEMENT,

CENTERS FOR DISEASE
CONTROL AND PREVENTION,

FOOD AND DRUG
ADMINISTRATION,

and

DEPARTMENT OF HEALTH &
HUMAN SERVICES,

Defendants.

Civil Action No. 25-cv-322

PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Local Civil Rule 65.1(a), Plaintiff Doctors for America hereby moves for a temporary restraining order (1) requiring Defendants Centers for Disease Control and Prevention (CDC), Food and Drug Administration (FDA), and Department for Health & Human Services (HHS) to restore webpages and datasets they have unlawfully removed from their websites; and (2) enjoining CDC, FDA, and HHS from removing or substantially modifying other webpages and datasets in implementation of the unlawful Office of Personal Management (OPM) memorandum on “Initial Guidance Regarding President Trump’s Executive Order *Defending*

Women.” Plaintiff further requests that the Court order Defendants to file a status report within forty-eight hours of the issuance of any temporary restraining order confirming compliance with this order. As set forth in more detail in the accompanying memorandum, Defendants’ actions violate the Administrative Procedure Act and the Paperwork Reduction Act of 1995. Plaintiff and its members are already experiencing irreparable harm from Defendants’ actions and will continue to experience harm until Defendants restore the removed webpages and datasets.

Pursuant to Local Civil Rule 65.1(a), at 2:00 p.m. on February 6, 2025, counsel for Plaintiff emailed the Chief of the Civil Division for the United States Attorney’s Office for the District of Columbia and three Assistant Directors for the Federal Programs Branch of the Department of Justice to provide actual notice that it would be filing this motion for a temporary restraining order. Plaintiff attached to that email electronic copies of the complaint, motion for temporary restraining order, and accompanying memorandum, declarations, and proposed order via e-mail before completing this electronic filing.

Dated: February 6, 2025

Respectfully submitted,
/s/ Zachary R. Shelley
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