UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

DOCTORS FOR AMERICA,

Plaintiff,

v.

Civil Action No. 25-cv-322-JDBth

OFFICE OF PERSONNEL MANAGEMENT, et al.,

Defendants.

NOTICE OF FILING OF EXHIBITS IN SUPPORT OF MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiff Doctors for America (DFA) hereby gives notice that, in further support of its Motion for a Temporary Restraining Order (ECF 6), it is submitting the following materials:

• Declaration of Stephanie Cohen, M.D., M.P.H., Director of the STI/HIV Prevention Section in the Disease Prevention and Control Branch of the Population Health Division of the San Francisco Department of Public Health (SFDPH), explaining that the SFDPH has "been severely impacted by the sudden removal of essential information from CDC's website." The declaration is attached as Exhibit A.

• Declaration of Dr. Susan Philip, Health Officer for the City and County of San Francisco, and Director of the Population Health Division of SFDPH, explaining some of the "immediate and serious public health consequences" of the absence of information or lack of confidence in available data. The declaration is attached as Exhibit B.

• Statement of American Academy of Family Physicians, the American Academy of Pediatrics, American College of Obstetricians and Gynecologists, American College of Physicians, American Osteopathic Association, and American Psychiatric Association, stating that removal of datasets and guidance from the websites of the CDC and National Institutes of Health "puts the health and wellbeing of patients at risk and makes it more difficult for physicians to provide quality care."¹ The declaration is attached as Exhibit C.

Dated: February 7, 2025

Respectfully submitted,

<u>/s/ Zachary R. Shelley</u> Zachary R. Shelley (DC Bar No. 90021549) Adina H. Rosenbaum (DC Bar No. 490928) Allison M. Zieve (DC Bar No. 424786) Public Citizen Litigation Group 1600 20th Street NW Washington, DC 20009 (202) 588-1000 zshelley@citizen.org

Counsel for Plaintiff

¹ The "six organizations represent the nation's frontline physicians who provide the overwhelming majority of care to our nation's children, pregnant women, adults, and elderly for a full-range of physical, mental, and behavioral health conditions. Each day the physicians [they] represent provide health care to patients in communities large and small, urban and rural rich, and poor. [The] organizations and the more than 560,000 members [they] represent are dedicated to the health and wellbeing of American families." Group of Six, https://www.groupof6.org/home.html. The groups' statement is also available at https://www.groupof6.org/dam/AAFP/ documents/advocacy/prevention/strategy/ST-Group6-DataGuidanceRemoval-020625 .pdf.