

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

**HARRIS COUNTY, TEXAS,**

*Plaintiff,*

v.

**U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES (“HHS”),**

*and*

**ROBERT F. KENNEDY, JR., SECRETARY  
OF HHS, IN HIS OFFICAL CAPACITY,**

*Defendants.*

Civ. No. 1:25-cv-01058

**MOTION FOR TEMPORARY  
RESTRAINING ORDER**

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**PLAINTIFF HARRIS COUNTY’S MOTION FOR  
TEMPORARY RESTRAINING ORDER**

Plaintiff Harris County (“the County”) hereby requests, under Federal Rule of Civil Procedure 65(b) and Local Civil Rule 65.1, that this Court issue a temporary restraining order, to remain in effect until such time as the Court can further consider the merits of Plaintiff’s claims (1) enjoining Defendant Department of Health and Human Services (“HHS”) and Defendant HHS Secretary Robert F. Kennedy, Jr. (collectively, “HHS”) from implementing, enforcing, or otherwise giving effect to any rule, order, policy, or other agency action suspending, freezing, pausing, withholding, or otherwise preventing the obligation or disbursement of appropriated funds in connection with the refugee resettlement programs administer by the County; and (2) declaring that Defendants shall take all steps necessary to fulfill its obligations related to the County’s provision of congressionally-mandated refugee resettlement program services, including

expenses incurred from January 20, 2025 until the end of March 2025, totaling approximately \$1.25M.

The County requests emergency relief due to the exigency of the circumstances and the irreparable nature of the injury that the temporary restraining order would prevent. Because Defendants have withheld refugee resettlement program grant funding, the County has been unable to access necessary funding for both expenses already incurred and future expenses. As a result, The County has suffered real-world harm, including to the 11,000 legally-admitted individuals and families to whom the County annually provides essential, congressionally-mandated medical services. As set forth in the accompany Memorandum of Law in Support of Plaintiff's Motion for a Temporary Restraining Order, HHS's unlawful withholding of the congressionally-appropriated federal grant funding at issue has resulted in the County's inability to continue operating its vital supportive programs and services.

Pursuant to Local Rule 65.1(a), at approximately 5:00pm CDT on April 8, 2025, the County's counsel sent an email to (1) counsel for the U.S. Department of Justice in the related cases (1) *National Council of Nonprofits v. OMB*, Civil No. 1:25-cv-00239 (LLA) (D.D.C.) (Daniel S. Schwei, Andrew S. Freidah, and Eitan R. Sirkovich); (2) *Catholic Charities, Diocese of Fort Worth, Inc., v. HHS*, Civil No. 1:25-cv-00605 (LLA) (D.D.C.) (Joseph F. Carilli, Jr.); and (3) *Pacito et al. v. Trump et al.*, No. 2:25-cv-255-JNW (W.D. Wa.) (Alexandra Lee Yeatts, August Flentje, Joseph McCarter, Lindsay Zimlik, and Nancy K. Canter). The County's provided copies of the County's complaint, notice of this motion for a temporary restraining order to be filed in the U.S. District Court for the District of Columbia, and the County's counsel's contact information. The County counsel subsequently provided filed copies of this motion and accompanying papers.

Dated: April 8, 2025

Respectfully submitted,

**CHRISTIAN D. MENEFEE**  
HARRIS COUNTY ATTORNEY

**JONATHAN G.C. FOMBONNE**  
DEPUTY COUNTY ATTORNEY AND  
FIRST ASSISTANT

**TIFFANY BINGHAM**  
MANAGING COUNSEL,  
AFFIRMATIVE & SPECIAL LITIGATION

/s/ Nina L.M. Oishi

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**ATTORNEYS FOR PLAINTIFF  
HARRIS COUNTY**

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**CERTIFICATE OF SERVICE**

I certify that, on April 8, 2025, I served the foregoing **Motion for Temporary Restraining Order and all accompanying supporting documents, as well as all pleadings filed in this action to date**, upon counsel for the U.S. Department of Justice in the related matter of *National Council of Nonprofits v. OMB*, Civil No. 1:25-cv-00239 (LLA) (D.D.C.). Due to the emergency nature of the temporary restraining order motion, counsel was served via email at the following e-mail addresses, which serve as their listed e-mail addresses with PACER/ECF:

Daniel S. Schwei, Esq: [Daniel.s.schwei@usdoj.gov](mailto:Daniel.s.schwei@usdoj.gov)

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Eitan R. Sirkovich, Esq.: [Eitan.r.sirkovich@usdoj.gov](mailto:Eitan.r.sirkovich@usdoj.gov)

/s/ Nina L.M. Oishi

Nina L.M. Oishi

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Joseph F. Carilli, Jr., Esq.: [joseph.carilli@usdoj.gov](mailto:joseph.carilli@usdoj.gov)

/s/ Nina L.M. Oishi

Nina L.M. Oishi

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Alexandra Lee Yeatts, Esq.: [alexandra.yeatts@usdoj.gov](mailto:alexandra.yeatts@usdoj.gov)

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/s/ Nina L.M. Oishi

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