

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

GAIL SCHECHTER,

*Plaintiff,*

v.

DOUGLAS COLLINS,

*Defendant.*

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Case No.: 1:25-CV-00551-RC

**PLAINTIFF’S NOTICE OF  
VOLUNTARY WITHDRAWAL  
OF MOTION FOR PRELIMINARY INJUNCTION**

Comes now Plaintiff, Gail Schechter (hereinafter “Ms. Schechter” or “Plaintiff”), by and through undersigned counsel, with her Notice of Voluntary Withdrawal of Motion for a Preliminary Injunction, at states as follows:

Plaintiff is one of the employees who was affected by mass termination of federal probationary employees that took place on or about February 13, 2025. Plaintiff filed the matter herein in response to what she asserts was an illegal action by the Defendant. On or about February 28, 2025, Plaintiff filed a Motion for a Preliminary Injunction, alleging *inter alia*, that she was being irreparably harmed as a result of a constitutional due process violation that entitled her injunctive relief. Since the filing of that motion, Plaintiff has been reinstated pursuant to a court order from the Northern District of California, which found that Plaintiff’s termination, as well as that of many other probationary employees, was unlawful. *See AFGE et al. v. United States Office of Personnel Management, et al.*, Case No. 3:25-cv-01780-WHA. The injunction issued by the Judge Alsup applies to Plaintiff, and as of the date of this Notice, Plaintiff has been returned to work.

While Plaintiff believes that the reputational and financial damages she has endured as a result of Defendant's illegal and unconstitutional actions still require redress, the immediacy of the need has been mitigated by the reinstatement of her employment. For these reasons, Plaintiff voluntarily withdraws her Motion for a Preliminary Injunction.

Respectfully submitted

/s/Pamela M. Keith

Pamela M. Keith

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*Counsel for Plaintiff*

### **CERTIFICATE OF SERVICE**

This is to certify that on this 3<sup>rd</sup> day of March 2025, a copy of the foregoing Plaintiff's Notice of Voluntary Withdrawal of Plaintiff's Motion for a Preliminary Injunction was served on counsel of record via ECF filing system on:

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*Counsel for Defendant*

/s/Pamela M. Keith  
Pamela M. Keith

