

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST
DOMESTIC VIOLENCE, *et al.*

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official
capacity as Secretary of the United States
Department of Health and Human Services, *et al.*

Defendants.

Case No. 25-cv-342

PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER

For the reasons provided in the attached memorandum, Plaintiffs hereby move for a temporary restraining order under Federal Rule of Civil Procedure 65:

1. Enjoining Defendant Scott Turner and Defendant Department of Housing and Urban Development, and any person in active concert or participation with those parties, (a) from requiring Pennsylvania Coalition Against Domestic Violence, House of Hope Community Development Corporation, Rhode Island Coalition to End Homelessness, or Virginia Sexual and Domestic Violence Action Alliance's members to agree to the following conditions or substantially similar conditions as a requirement for receiving funding; and (b) from otherwise enforcing these or substantially similar conditions against those organizations:
 - a. The requirement that the recipient not "use grant funds to promote 'gender ideology,' as defined in E.O. 14168, Defending Women from Gender

Ideology Extremism and Restoring Biological Truth to the Federal Government”

- b. The requirement that the recipient “agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of section 3729(b)(4) of title 31, United States Code [and] ... certifies that it does not operate any programs that violate any applicable Federal antidiscrimination laws, including Title VI of the Civil Rights Act of 1964”;
 - c. The requirement that the recipient “not use any Grant Funds to fund or promote elective abortions, as required by E.O. 14182, Enforcing the Hyde Amendment”; and
 - d. The condition that “the Recipient’s use of funds provided under this Agreement ... , and the Recipient’s operation of projects assisted with Grant Funds are governed by ... [a]ll current Executive Orders.”
2. Enjoining Defendant Robert F. Kennedy, Jr., Defendant the United States Department of Health and Human Services, Defendant Andrew Gradison, Defendant the Administration for Children and Families, Defendant Susan Monarez, and Defendant the Centers for Disease Control and Prevention, and any person in active concert or participation with those parties, (a) from requiring Plaintiffs the Colorado Coalition Against Sexual Assault; the Idaho Coalition Against Domestic Violence; Jane Doe Inc., the Massachusetts Coalition Against Sexual Assault and Domestic Violence; the Kansas Coalition Against Sexual

Assault and Domestic Violence; the Montana Coalition Against Sexual and Domestic Violence; Oregon Coalition Against Domestic and Sexual Violence; Valor US; Virginia Sexual and Domestic Violence Action Alliance; and Wisconsin Coalition Against Sexual Assault to agree to the following condition or any substantially similar condition as a requirement for receiving funding; and (b) from otherwise enforcing this or any substantially similar condition against those organizations:

- a. The requirement that, “[b]y accepting the grant award, recipients are certifying that ... [t]hey do not, and will not during the term of this financial assistance award, operate any programs that advance or promote DEI, DEIA, or discriminatory equity ideology in violation of Federal anti-discrimination laws.”
3. Ordering all Defendants, within 24 hours of entry of a temporary restraining order, to file a notice confirming that they have informed relevant officials at each agency of the temporary restraining order.

Plaintiffs also respectfully request expedited consideration of this motion and are available for a hearing.

July 21, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the within document, the attached memorandum in support, and all attached supporting exhibits and documents, via the ECF system on the 21st day of July, 2025, that these documents are available for viewing and downloading to all counsel of record, and that I provided the same documents by email to: Eric Beckenhauer, Assistant Director, U.S. Department of Justice, Civil Division, Federal Programs Branch, Eric.Beckenhauer@usdoj.gov; Lesley Farby, Deputy Director, U.S. Department of Justice, Civil Division, Federal Programs Branch, Lesley.Farby@usdoj.gov; and Kevin Hubbard, Civil Division Chief, United States Attorney's Office for the District of Rhode Island, Kevin.Hubbard@usdoj.gov.

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