

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

PLANNED PARENTHOOD OF)	
GREATER NEW YORK, <i>et al.</i>)	
)	
Plaintiffs,)	
v.)	Civil Action No. 25-cv-2453
)	
U.S. DEPARTMENT OF HEALTH AND)	
HUMAN SERVICES, <i>et al.</i>)	
)	
Defendants.)	
)	

PLAINTIFFS’ EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65(a) and Local Civil Rule 65.1, Plaintiffs Planned Parenthood of Greater New York (PPGNY) and Planned Parenthood of California Central Coast (PPCCC) (collectively, TRO Plaintiffs) respectfully move for a temporary restraining order.

Specifically, to preserve the status quo and avoid significant irreparable harm, Plaintiffs move the Court to enjoin enforcement of the U.S. Department of Health and Human Services’ July 1, 2025, “Teen Pregnancy Prevention Policy Notice” (Program Mandate) pending the conclusion of these proceedings. Plaintiffs respectfully request that the Court permit TRO Plaintiffs to continue to operate their programs and draw down funds for Year 3 under their previously approved Non-Competing Continuation (NCC) applications, so long as they remain in compliance with the agency’s Materials Review Guidance dated January 2025. Plaintiffs additionally request that the Court order Defendants, their officers, agents, successors, employees, attorneys; and other persons who are in active concert or participation with any of them not to pause, freeze, impede, block, cancel, or terminate any awards pursuant to the Teen Pregnancy Prevention Program to which TRO Plaintiffs are awardees. TRO Plaintiffs request that any injunction preserve Plaintiffs’ status and rights with respect to funds claimed or received while the Court’s order is in effect, and

any claims for funding or reimbursement submitted by Plaintiffs during the duration of the order shall be deemed lawful and valid under their respective grant agreements, even if the order is subsequently vacated, modified, or reversed.

TRO Plaintiffs respectfully request that the Court rule on their motion by no later than July 31, 2025, as Plaintiff PPGNY will be forced to terminate its programming if it cannot obtain relief by that date. Plaintiff PPCCC faces an immediate deadline soon thereafter on August 15, 2025, when it must resubmit its programming plans and certify that all programming materials comply with the agency's unlawful Program Mandate.

TRO Plaintiffs notified counsel for the Government at the U.S. Attorney's Office and Federal Programs Branch of this motion the morning of July 29, 2025. As of the time of this filing, the Government has not taken a position on the motion.

The grounds for this motion are set forth in the accompanying Memorandum in Support of Plaintiffs' Emergency Motion for a Temporary Restraining Order.

Dated: July 29, 2025

Respectfully submitted,

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