

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

SOCIETY OF GENERAL INTERNAL  
MEDICINE & NORTH AMERICAN  
PRIMARY CARE RESEARCH  
GROUP,

*Plaintiffs,*

v.

ROBERT F. KENNEDY, JR., *et al.*,  
*Defendants.*

Case No. 8:25-cv-2751-BAH

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, and for the reasons set forth in the accompanying memorandum, Plaintiffs the Society of General Internal Medicine (SGIM) and the North American Primary Care Research Group (NAPCRG) hereby move for a preliminary injunction enjoining Defendants to restart the grantmaking activity of the Agency for Healthcare Research and Quality (AHRQ). AHRQ, a component of the Department of Health and Human Services (HHS), is tasked by statute with spending substantial annual appropriations, including through external grants, on research to improve healthcare quality, safety, and efficacy, and with conducting peer review of applications for such external grants. Defendants—Secretary of Health and Human Services Robert F. Kennedy, Jr., HHS, AHRQ Director Roger D. Klein, and AHRQ—violated those clear commands by halting AHRQ grantmaking. In halting AHRQ's grantmaking activity, Defendants have refused to process or consider pending grant applications and declined to obligate appropriated funds that are set to expire on September 30, 2025. To avoid irreparable harm to their members with pending grant applications, as well as to Plaintiff NAPCRG, while the

Court considers the case, Plaintiffs seek a preliminary injunction that would (1) require Defendants to restart the review of AHRQ grant applications and the award of grants using AHRQ's appropriated funds; (2) order that Defendants make all fiscal year 2025 grant funds available for obligation; and (3) extend the date that AHRQ's fiscal year 2025 appropriated funds are available for obligation throughout the pendency of this litigation.

At approximately 11:55 AM on August 21, 2025, counsel for Plaintiffs emailed the Director and Deputy Director for the Federal Programs Branch of the Department of Justice and the Chief of the Civil Division of the U.S. Attorney's Office for the District of Maryland to provide them with electronic copies of the complaint, motion for a preliminary injunction, and accompanying memorandum, declarations, and proposed order via e-mail before completing this electronic filing.

Dated: August 21, 2025

Respectfully submitted,

/s/ Stephanie B. Garlock

Stephanie B. Garlock (D. Md. Bar No. 31594)

Allison M. Zieve

(*pro hac vice* application forthcoming)

Cormac A. Early

(*pro hac vice* application forthcoming)

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