

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

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|                                  | ) |                             |
| 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’ MOTION FOR SUMMARY JUDGMENT**

Plaintiffs Planned Parenthood of Greater New York (PPGNY), Planned Parenthood of California Central Coast (PPCCC), and Planned Parenthood of the Heartland (PPH) respectfully move this Court for summary judgment on Counts I, III, IV, and V in the above-captioned litigation in accordance with Federal Rule of Civil Procedure 56 and Civil Local Rule 56-1.<sup>1</sup>

On July 1, 2025, the U.S. Department of Health and Human Services’ (HHS) issued its *OASH Teen Pregnancy Prevention Program Policy Notice* (Policy Notice), which unlawfully imposes substantial requirements on the Teen Pregnancy Prevention (TPP) Program. For over fifteen years, the TPP Program has successfully reduced unintended teen pregnancy and related health disparities through an evidence-based, congressionally mandated public health initiative. The Policy Notice unlawfully conditions continued TPP Program funding on grant recipients’ compliance with amorphous requirements that are contrary to law, unsupported by evidence, and

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<sup>1</sup> Plaintiffs are no longer pursuing Count II of the Complaint raising a First Amendment claim under the Administrative Procedure Act.

directly contravene the very purpose of the TPP program. The Policy Notice should, therefore, be vacated.

In support of their motion, Plaintiffs rely on the accompanying brief and statement of material facts submitted concurrently, as well as the accompanying declarations and exhibits.

Dated: August 25, 2025

Respectfully submitted,

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