

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ETHICAL SOCIETY OF POLICE; NAACP  
ST. LOUIS COUNTY; MISSIONARY  
BAPTIST STATE CONVENTION OF  
MISSOURI; TWO WRASSLIN' CATS  
ACCORD; OUT ACCOUNTABILITY  
PROJECT; BERKSHIRE RESOURCES FOR  
INTEGRATION OF DIVERSE GROUPS  
AND EDUCATION; NAACP STATE  
CONFERENCE COLORADO-MONTANA-  
WYOMING; PEACEMAKERS LODGE;  
PIKES PEAK SOUTHERN CHRISTIAN  
LEADERSHIP CONFERENCE 1;  
WELLSPRING HEALTH ACCESS; and  
HAITIAN COMMUNITY HELP & SUPPORT  
CENTER,

*Plaintiffs,*

v.

PAMELA J. BONDI, in her official capacity  
as Attorney General of the United States; and  
U.S. DEPARTMENT OF JUSTICE,

*Defendants.*

**Case No. 25-CV-13115 (IT)**

**PLAINTIFFS' MOTION FOR ORDER SETTING MERITS HEARING**

Plaintiffs file this Motion to request that the Court set an evidentiary hearing on the  
merits of this matter for one full day during the week of December 3, 2025.

At the hearing on Plaintiffs' Motion for Temporary Restraining Order ("TRO") held on  
October 29, 2025, the Court expressed interest in holding an evidentiary hearing on the  
substance of Defendants' self-described "dissolution" of the Community Relations Service  
("CRS"). The Court directed the parties to confer about a mutually agreeable date for such a  
hearing, and further asked the parties about their amenability to merge any consideration of a  
possible preliminary injunction motion with the final merits.

In light of the Court's order denying the TRO, including the finding that Plaintiffs have made a strong showing that they are likely to succeed on the merits of their challenge to the shuttering of CRS, Plaintiffs believe it is in the interests of efficiency and justice to proceed, on an expeditious basis, directly to a hearing on the merits.

The request for a hearing date the week of December 3 is based on Plaintiffs' understanding that the Court has a three-week trial scheduled to begin on Monday, November 10, making the week of December 3 the earliest feasible week for a trial in this matter. Should a trial date become available the week of November 17 (for example, because the Court's other trial settles or concludes early), Plaintiffs would be interested in availing themselves of an earlier hearing date, if schedules permit.

Counsel for Plaintiffs has conferred with counsel for Defendants, who opposed setting a merits hearing (and favored motions practice instead), but they did not object to the week of December 3 from a scheduling perspective.<sup>1</sup> Defendants represent that they intent to file an opposition to this Motion no later than Monday, November 3.

Defendants submit that, in light of the Court's expressed interest in holding an evidentiary hearing, one should be set as early as feasible, and would not prejudice parallel motions practice.

Dated: October 31, 2025

Respectfully Submitted,

*/s/ Kyle R. Freeny*  
 Kyle R. Freeny\*  
 (DC Bar No. 1684764)  
 WASHINGTON LITIGATION GROUP

---

<sup>1</sup> Undersigned counsel began conferring with Defendants' counsel the morning of October 30, 2025, including about the prospect that the government might agree to voluntarily hold the Reductions in Force ("RIF") of CRS employees in abeyance to allow a more relaxed schedule for briefing and resolution of this case. Defendants took that request under advisement but ultimately rejected it.

1717 K Street NW  
Washington, DC 20006  
Telephone: (202) 521-8750  
[KFreeny@WashingtonLitigationGroup.org](mailto:KFreeny@WashingtonLitigationGroup.org)

Ana Muñoz  
(Mass. Bar No. 569233)  
ZALKIND DUNCAN & BERNSTEIN LLP  
2 Oliver Street, Suite 200  
Boston, MA 02110  
Telephone: (617) 742-6020  
[AMunoz@ZalkindLaw.com](mailto:AMunoz@ZalkindLaw.com)

*Counsel for Plaintiffs*

*\* Admitted Pro Hac Vice*

October 31, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon all attorneys of record by electronic filing on the above date.

*/s/ Kyle R. Freeny*  
Kyle R. Freeny

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 37.1**

I, Kyle R. Freeny, certify that on October 31, 2025, I spoke by Zoom with Abby Stout, counsel of record for Defendants, who indicated Defendants oppose setting a hearing on the merits of Plaintiffs' claims but who did not object to the week of December 3 from a scheduling perspective. Counsel for Defendants confirmed by email their intent to file an opposition to this Motion no later than Monday, November 3, 2025.

*/s/ Kyle R. Freeny*  
Kyle R. Freeny