

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

ETHICAL SOCIETY OF POLICE, *et al.*,

Plaintiffs,

v.

PAMELA J. BONDI, in her official  
capacity as Attorney General of the United  
States, *et al.*,

Defendants.

No. 1:25-cv-13115-IT

**DEFENDANTS' NOTICE REGARDING RIF RESCISSION AND RESPONSE TO  
PLAINTIFFS' MOTION FOR STATUS CONFERENCE**

On September 29, 2025, the Department of Justice sent Reduction in Force (“RIF”) notices to fourteen Community Relations Services (“CRS”) employees. On January 9, 2026, as a matter of administrative discretion, Defendants rescinded the RIF notices issued to CRS employees.<sup>1</sup>

Earlier today, Plaintiffs filed a motion for a status conference. *See* ECF No. 72. Defendants do not oppose this request but ask that any such conference only be held after two events: (1) a meet and confer conducted telephonically between the parties; and (2) the preparation and filing of a joint status report by the parties. When emailing with Plaintiffs’ counsel earlier today, Defendants did not intend to convey an “unwillingness” to meet and confer with Plaintiffs before Thursday, January 15, 2026. Defendants remain ready and willing to

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<sup>1</sup> Because one of the fourteen CRS employees who received a RIF notice did not ultimately separate from the Department, the RIF rescission notice was sent to the thirteen employees who were separated by RIF, resignation, or retirement.

confer with Plaintiffs. Offering an initial date that Plaintiffs' counsel does not prefer was not meant to convey an "unwillingness" to consider any other suggested dates or times. Defendants reject this characterization of their emailed response and have attached a full copy for clarification. *See* Exhibit A.

In any event, the Court would be better served by waiting to hold any status conference until after the parties confer. Defendants also propose that the parties file a joint status report before any Court conference is held to ensure the Court's time is spent efficiently.<sup>2</sup>

Dated: January 13, 2026

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General

YAAKOV M. ROTH  
Principal Deputy Assistant Attorney General

DIANE KELLEHER  
Branch Director  
Federal Programs Branch

/s/ Abigail Stout  
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<sup>2</sup> As did Plaintiffs, the undersigned will notify the Court's courtroom deputy about this filing via email.

**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 January 13, 2026.

/s/ Abigail Stout