UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

DOCTORS FOR AMERICA, et al.

Plaintiffs,

v.

Civil Action No. 25-cv-322-JDB

OFFICE OF PERSONNEL MANAGEMENT, et al.

Defendants.

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION AND FOR EXPEDITED SUMMARY JUDGMENT

Pursuant to Federal Rules of Civil Procedure 56 and 65, Plaintiffs respectfully request that this Court grant a preliminary injunction and expedited summary judgment on their claims that Defendants' actions violate the Administrative Procedure Act. In support of this motion, Plaintiffs submit the accompanying memorandum of law, declarations of Angie Bakke, Dr. Stephanie Cohen, Dr. Daniel Debowy, Dr. Kathryn Harris, Dr. Han Yu Stephanie Liou, Dr. Susan Philip, Dr. Reshma Ramachandran, Dr. McKayla E. Saine, and Dr. Eugenia Siegler, and a proposed order.

Dated: March 11, 2025

Respectfully submitted, <u>/s/ Zachary R. Shelley</u> Zachary R. Shelley (DC Bar No. 90021549) Adina H. Rosenbaum (DC Bar No. 490928) Allison M. Zieve (DC Bar No. 424786) Public Citizen Litigation Group 1600 20th Street NW Washington, DC 20009 (202) 588-1000 zshelley@citizen.org

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/s/ David S. Louk

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