

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

**HARRIS COUNTY, TEXAS, *et al.*,**

*Plaintiffs,*

v.

**ROBERT F. KENNEDY, JR.,** in his  
official capacity as Secretary of Health  
and Human Services, *et al.*,

*Defendants.*

Case No. 1:25-cv-01275-CRC

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs Harris County, Texas; Columbus, Ohio; Nashville, Tennessee; and Kansas City, Missouri (together, "Plaintiff Local Governments"); and American Federation of State, County and Municipal Employees, AFL-CIO ("AFSCME") (collectively, "Plaintiffs") respectfully move pursuant to Federal Rule of Civil Procedure 65 for a preliminary injunction. For the reasons presented in the accompanying memorandum in support of this motion, the Court should enter an order that enjoins Defendants from implementing their decision in March 2025 to terminate grant programs under Congressional appropriations to the Centers for Disease Control and Prevention for pandemic preparedness, including grant programs that paid for essential public health activities of Plaintiff Local Governments and of other state and local governments that employ members of Plaintiff AFSCME. The specific contours of the relief that Plaintiffs seek are provided in the accompanying proposed order.

Pursuant to Local Rule 65.1(d), Plaintiffs respectfully request a hearing within twenty-one days on their application for preliminary injunctive relief.

Dated: April 30, 2025

Respectfully submitted,

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\*Admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

On April 29, 2025, I sent the Complaint in this case to the following United States Department of Justice attorneys and notified them that this Motion for a Preliminary Injunction would be filed in this case:

Diane Kelleher, U.S. Department of Justice, Email: [diane.kelleher@usdoj.gov](mailto:diane.kelleher@usdoj.gov)

Alex Haas, U.S. Department of Justice, Email: [alex.haas@usdoj.gov](mailto:alex.haas@usdoj.gov)

John Griffiths, U.S. Department of Justice, Email: [john.griffiths@usdoj.gov](mailto:john.griffiths@usdoj.gov)

On the same day, I received email confirmation from Diane Kelleher that she had received the Complaint. On April 30, 2025, I caused the foregoing Motion for a Preliminary Injunction and accompanying exhibits to be served by certified mail on Defendants. On the same day, I further caused these documents to be served via email the above-listed attorneys.

/s/ Jonathan G.C. Fombonne  
JONATHAN G.C. FOMBONNE