

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

PLANNED PARENTHOOD OF)	
GREATER NEW YORK <i>et al.</i>)	
)	
Plaintiffs,)	
v.)	Civil Action No. 1:25-cv-1334-TJK
)	
U.S. DEPARTMENT OF HEALTH AND)	
HUMAN SERVICES, <i>et al.</i>)	
)	
Defendants.)	
)	

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs Planned Parenthood of Greater New York, Planned Parenthood Great Northwest, Hawai'i, Alaska, Indiana and Kentucky, Planned Parenthood of the Heartland, Planned Parenthood California Central Coast, and Planned Parenthood Mar Monte respectfully move for a preliminary injunction.

Specifically, to preserve the status quo, Plaintiffs move the Court to preliminarily enjoin implementation of the unlawful new requirements imposed by Defendants Department of Health and Human Services (HHS) and HHS Secretary, Robert F. Kennedy, Jr., through the *Guidance for Preparing a Non-Competing Continuation (NCC) Award Application* on Teen Pregnancy Prevention Program Tier 1 grant recipients and any actions to implement those requirements, and permit Tier 1 funding recipients to submit new or amended applications, as set forth in the contemporaneously filed proposed order.

Plaintiffs respectfully request that the Court rule on their motion by no later than June 15, 2025, so that applicants can submit applications and have them resolved before the new funding cycle begins on July 1, 2025.

The grounds for this motion are set forth in the accompanying Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction.

Dated: May 12, 2025

Respectfully submitted,

By: /s/ Andrew Tutt
Drew A. Harker (DC Bar # 412527)
Andrew T. Tutt (DC Bar # 1026916)
Daniel Yablon (DC Bar # 90022490)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, NW
Washington, DC 20001
(202) 942-5000
draw.harker@arnoldporter.com
andrew.tutt@arnoldporter.com
daniel.yablon@arnoldporter.com

Emily Nestler (DC Bar # 973886)
PLANNED PARENTHOOD FEDERATION OF
AMERICA
1100 Vermont Avenue NW
Washington, DC 20005
(202) 973-4800
emily.nestler@ppfa.org

Valentina De Fex**
Kyla Eastling**
PLANNED PARENTHOOD FEDERATION OF
AMERICA
123 William Street, Floor 9
New York, NY 10038
valentina.defex@ppfa.org
kyla.eastling@ppfa.org

Attorneys for Plaintiffs

*** pro hac vice forthcoming*