

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

PLANNED PARENTHOOD FEDERATION  
OF AMERICA, INC.; PLANNED  
PARENTHOOD LEAGUE OF  
MASSACHUSETTS; and PLANNED  
PARENTHOOD ASSOCIATION OF UTAH,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official  
capacity as SECRETARY OF THE U.S.  
DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; U.S. DEPARTMENT  
OF HEALTH AND HUMAN SERVICES;  
MEHMET OZ, in his official capacity as  
ADMINISTRATOR OF THE CENTERS  
FOR MEDICARE & MEDICAID  
SERVICES; and CENTERS FOR  
MEDICARE & MEDICAID SERVICES,

Defendants.

Case No. 1:25-cv-11913-IT

**JOINT MOTION TO STAY FURTHER DISTRICT COURT PROCEEDINGS PENDING  
RESOLUTION OF THE GOVERNMENT’S MOTION TO STAY PRELIMINARY  
INJUNCTIONS PENDING APPEAL**

Plaintiffs Planned Parenthood Federation of America, Inc., Planned Parenthood League of Massachusetts, and Planned Parenthood Association of Utah and Defendants Robert F. Kennedy, Jr., the U.S. Department of Health and Human Services, Mehmet Oz, and Centers for Medicare & Medicaid Services (together, “the Parties”), jointly move the Court to stay further district court proceedings pending resolution of Defendants’ Motion to Stay Preliminary Injunctions Pending Appeal (Doc. No. 84), as well as any further motions to stay the preliminary injunctions on appeal.

As grounds for this Joint Motion, the Parties state as follows:

1. On July 7, 2025, Plaintiffs filed their Complaint and Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. *See* Doc. Nos. 1, 4, 5.

2. On July 21, 2024, the Court issued a Memorandum & Order in which Plaintiffs' Motion for Preliminary Injunction was granted in part and otherwise remained under advisement. Doc. No. 62.

3. The Court issued a separate Memorandum & Order resolving and granting Plaintiffs' Motion on July 28, 2025. Doc. No. 69.

4. On August 7, 2025, Defendants filed a Motion to Stay Preliminary Injunctions Pending Appeal (the "Motion"). Doc. No. 84.

5. The Parties believe that resolution of Defendants' Motion, and any similar motion on appeal, could provide clarity on next steps in the case, including the issues on which discovery is necessary. As a result, for efficiency, the Parties ask this Court to stay further district court proceedings in this case (with the exception of proceedings on Defendants' Motion to Stay Preliminary Injunctions Pending Appeal), pending resolution of such motions.

6. Good cause exists to grant this Joint Motion.

7. No Party will be prejudiced by this Joint Motion, and the relief requested here will not significantly delay this matter.

WHEREFORE, the Parties respectfully request that this Joint Motion be allowed and that further district court proceedings be stayed pending resolution of Defendants' Motion to Stay Preliminary Injunctions Pending Appeal, as well as any similar motion made on appeal.

**LOCAL RULE 7.1 CERTIFICATE**

Undersigned counsel certifies that counsel have conferred regarding this motion and that it is made jointly with the assent of all Parties as reflected below.

Dated: August 11, 2025

Respectfully submitted,

*Counsel for Plaintiffs:*

Emily Nestler\*  
PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.  
1110 Vermont Avenue, NW  
Washington, D.C. 20005  
Tel.: (202) 973-4800  
emily.nestler@ppfa.org

Jennifer Sandman\*  
C. Peyton Humphreville\*  
Kyla Eastling\*  
PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.  
123 William Street  
New York, NY 10038  
Tel.: (212) 441-4363  
jennifer.sandman@ppfa.org  
peyton.humphreville@ppfa.org  
kyla.eastling@ppfa.org

/s/ Alan Schoenfeld  
Alan Schoenfeld\*  
Cassandra A. Mitchell\*  
Alex W. Miller\*  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Tel.: (212) 230-8800  
Fax: (212) 230-8888  
alan.schoenfeld@wilmerhale.com  
cassie.mitchell@wilmerhale.com  
alex.miller@wilmerhale.com

Sharon K. Hogue, BBO# 705510  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
60 State Street  
Boston, MA 02109  
Tel.: (617) 526-6000  
Fax: (617) 526-5000  
sharon.hogue@wilmerhale.com

Albinas J. Prizgintas\*  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
Tel.: (202) 663-6000  
Fax: (202) 663-6363  
albinas.prizgintas@wilmerhale.com

*Counsel for Defendants:*

Brett A. Shumate  
Assistant Attorney General  
Civil Division

Yaakov M. Roth  
Principal Deputy Assistant Attorney General  
Civil Division

Eric J. Hamilton  
Deputy Assistant Attorney General  
Civil Division

Bradley Humphreys  
Jacob S. Siler  
Trial Attorneys  
Federal Programs Branch

/s/ Emily Margaret Hall

Emily Margaret Hall  
DOJ-Civ  
Civil Division, Office of the Assistant  
Attorney General  
950 PENNSYLVANIA AVE. NW  
WASHINGTON, DC 20530  
202-307-6482  
emily.hall@usdoj.gov

Elisabeth Neylan  
DOJ-Civ  
1100 L St. NW  
Washington, DC 20005  
771-217-8180  
elisabeth.j.neylan@usdoj.gov

Elizabeth Themins Hedges  
DOJ-Civ  
950 Pennsylvania Ave NW  
Washington, DC 20530  
771-209-1978  
elizabeth.t.hedges@usdoj.gov

Michelle R. Bennett  
Assistant Director  
Federal Programs Branch

*\*Pro hac vice application granted.*

**CERTIFICATE OF SERVICE**

Counsel for Plaintiffs hereby certify that a true and correct copy of this document has been served on all counsel of record through the Court's ECF system on August 11, 2025.

Dated: August 11, 2025

*/s/ Alan Schoenfeld*

---

Alan Schoenfeld