

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST
DOMESTIC VIOLENCE, *et al.*

Plaintiffs,

v.

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

Defendants.

Case No. 25-cv-342

**PLAINTIFFS’ SECOND MOTION TO AMEND
THE TEMPORARY RESTRAINING ORDER**

Plaintiffs move to expand the Court’s July 28, 2025, Temporary Restraining Order (TRO) (ECF 23) to additional Plaintiffs and their members, and additional grant programs subject to the same unlawful conditions as are covered by the existing TRO. This request is in addition to Plaintiffs’ first Motion to Amend the Temporary Restraining Order, ECF No. 28. Expansion of the TRO is warranted for the same reasons the initial TRO was warranted, as explained in Plaintiffs’ memorandum of law (ECF 13-1).

Since the Court entered its TRO, Plaintiff Coalitions have learned of additional members that must imminently accept grants from the Department of Housing and Urban Development (HUD) containing the unlawful funding conditions covered by the TRO. For example, multiple members of Plaintiff California Partnership to End Domestic Violence received grant agreements including the funding conditions covered by the TRO that those members must accept imminently. One member received a grant from HUD on July 31, 2025 that the member must

accept by this Friday, August 8, 2025. These grants to the California Partnership's members include grants from HUD under the Community Development Block Grant program and the Continuums of Care (CoC) Program. Plaintiff the Montana Coalition Against Domestic and Sexual Violence has also learned that multiple members received HUD CoC grants with the unlawful conditions and need to accept them by the end of August.

Given these developments, Plaintiffs ask that the Court expand the TRO to cover California Partnership Against Domestic Violence, Montana Coalition Against Domestic and Sexual Violence, and those Plaintiffs' members and to cover Community Development Block grants in addition to CoC grants.

Plaintiffs anticipate that they and their members will continue to receive grant awards with the challenged conditions in the coming weeks, and that Plaintiffs will learn of additional members requiring immediate relief from the unlawful conditions. Should the Court wish to avoid periodic motions to expand the TRO in light of such developments, it could expand the TRO to cover all Plaintiffs and their members and all grant programs with the challenged conditions. Such relief would conserve the Court's and the parties' resources while imposing no additional burden on Defendants beyond what Plaintiffs would seek via one-off expansions of the TRO.

Undersigned counsel conferred with counsel for the government by email on August 6, 2025, about providing Plaintiffs' members with temporary relief. Defendants did not provide their position before Plaintiffs filed the motion.

August 6, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2025, I electronically filed the within motion and it is available for viewing and downloading from the Court's CM/ECF System, and that the participants in the case that are registered CM/ECF users will be served electronically by the CM/ECF system.

/s/ Amy R. Romero