

**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. 1:25-cv-00342

STIPULATION

Plaintiffs and Defendant Robert F. Kennedy, Jr., in his official capacity as Secretary of the U.S. Department of Health & Human Services (“HHS”), Defendant HHS, Defendant Andrew Gradison, and Defendant the Administration for Children and Families (“ACF”), agree and stipulate as follows:

1. On May 8, 2025, ACF issued a Standard Terms and Conditions document requiring that a “Civil Rights Assurance” term and condition apply to new awards made on or after May 8, 2025. The Civil Rights Assurance required recipients with such awards to “certify[]” that “[t]hey do not, and will not during the term of this financial assistance award, operate any programs that advance or promote the following in violation of Federal anti-discrimination laws: DEI, DEIA, or discriminatory equity ideology.” ACF, Standard Terms and Conditions at 7 (effective May 9, 2025), <https://perma.cc/ZFP7-KPAH>.¹

¹ Plaintiffs have labeled this term the “ACF Anti-DEI Certification.” Pls.’ Mem. I.S.O. Mot. for Relief Under 5 U.S.C. § 705 and for Preliminary Injunction at 11-12 (ECF No. 30-1).

2. On July 29, 2025, ACF updated its Standard Terms and Conditions to remove the “Civil Rights Assurance” term and condition.
3. The “Civil Rights Assurance” term and condition (referred to as the “ACF Anti-DEI Certification” in Plaintiffs’ filings) does not apply to any ACF awards, including but not limited to: (1) awards made between May 8, 2025, and July 29, 2025; (2) awards that recipients accepted (by drawing funds or otherwise) between May 8, 2025, and July 29, 2025; (3) subawards on awards administered by ACF; and (4) awards of Family Violence Prevention and Services Act funds passed from ACF to grantees through state administrators.
4. In consideration of this stipulation, Plaintiffs withdraw their request for preliminary relief with respect to the “Civil Rights Assurance” term and condition in the ACF Standard Terms and Conditions (referred to in paragraphs A.4.a and B.2.a of Plaintiffs’ Motion for Relief Under 5 U.S.C. § 705 and for Preliminary Injunction (ECF No. 30)).
5. Plaintiffs continue to seek preliminary relief with respect to all other conditions discussed in their motion. With respect to the HHS-related Defendants, for purposes of the Motion for Relief Under 5 U.S.C. § 705 and for Preliminary Injunction, such claims are now limited to the ACF Title IX Certification and HRSA Title IX Certification.
6. Plaintiffs reserve the right to challenge the “Civil Rights Assurance” term and condition at a later stage of this case.

August 8, 2025

Respectfully submitted,

/s/ Nina Cahill

Nina Cahill (D.C. Bar No. 1735989)⁺

Daniel F. Jacobson (D.C. Bar # 1016621)⁺

Lynn D. Eisenberg (D.C. Bar No. 1017511)⁺

Brian C. Rosen-Shaud (ME Bar No. 006018)^{+ ^}
Jacobson Lawyers Group PLLC
1629 K Street NW, Suite 300
Washington, DC 20006
(301) 823-1148
dan@jacobsonlawyersgroup.com

/s/ Kristin Bateman

Kristin Bateman (Cal. Bar No. 270913)^{+ ^}
Robin F. Thurston (D.C. Bar No. 1531399)⁺
Skye L. Perryman (D.C. Bar No. 984573)⁺
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043
(202) 448-9090
kbateman@democracyforward.org
rthurston@democracyforward.org
sperryman@democracyforward.org

/s/ Amy R. Romero

Amy R. Romero (RI Bar # 8262)
DeLuca, Weizenbaum, Barry & Revens, Ltd.
199 North Main Street
Providence, RI 02903
(401) 453-1500
Amy@dwbrlaw.com
Cooperating counsel, Lawyers' Committee for RI

/s/ Lynette Labinger

Lynette Labinger (RI Bar # 1645)
128 Dorrance St., Box 710
Providence, RI 02903
(401) 465-9565
ll@labingerlaw.com
Cooperating counsel, ACLU Foundation of RI

/s/ Mary C. Dunn

Mary C. Dunn (RI Bar #6712)
Blish & Cavanagh LLP
30 Exchange Terrace
Providence, RI 02903
(401) 831-8900
mcd@blishcavlaw.com
Cooperating counsel, Lawyers' Committee for RI

/s/ Lauren A. Khouri

Lauren A. Khouri (D.C. Bar No. 10282288)⁺
Elizabeth Theran (D.C. Bar No. 90030162)⁺
National Women's Law Center
1350 I Street NW, Suite 700
Washington, DC 20005
Telephone: (202) 588-5180
Fax: (202) 588-5185
lkhouri@nwlc.org
etheran@nwlc.org

⁺ Admitted *pro hac vice*

[^] Not admitted in the District of Columbia. Practice supervised by members of the D.C. bar.

Counsel for Plaintiffs

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES; ROBERT F. KENNEDY, JR., in his official capacity as Secretary of Health & Human Services; and all other HHS-affiliated defendants,

By their Attorneys,

SARA MIRON BLOOM
Acting United States Attorney

/s/ Lauren S. Zurier
LAUREN S. ZURIER
Assistant United States Attorney
One Financial Plaza, 17th Floor
Providence, RI 02903
Ph: (401) 709-5000
Fax: (401) 709-5001
Lauren.Zurier@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2025, I electronically filed the within stipulation, 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/ Nina Cahill