

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

**DEFENDANTS' MOTION FOR ADDITIONAL TIME IN WHICH TO
COMPLY WITH PRELIMINARY INJUNCTION ORDER'S
NOTICE REQUIREMENTS**

Defendants respectfully request additional time in which to comply with the order the Court entered on Friday, October 10, 2025, enjoining enforcement of the so-called "Challenged Conditions" that are the subject of the instant lawsuit. Defendants make the request for two reasons.

First, after discussion, Plaintiffs' counsel and Defendants' counsel have emailed the Court's case manager to jointly request a conference with the Court concerning several aspects of the October 10th order that they believe require additional clarification. Depending on the outcome of that conference, the order that Defendants must comply with may prove to be a bit different than the one the Court issued. To avoid confusion at the agency level, the Defendants would like to avoid issuing multiple conflicting notices to agency employees.

Second, due to the ongoing government shutdown, agency counsel have advised Defendants' counsel that a few more days than "normal" will be necessary to send out the relevant notices because some of the personnel responsible for approving and/or sending out the

notices have been furloughed. Although alternative arrangements can be made, additional time is necessary to make them.

For these reasons, Defendants request additional time in which to comply with the order. Depending on what happens at the conference the parties have sought, Defendants suggest that five working days after the conference may be sufficient to permit compliance under the circumstances.

Dated: October 14, 2025

Respectfully submitted,

U.S. DEPARTMENT OF HEALTH
AND HUMAN SERVICES; ROBERT
F. KENNEDY, JR., in his official
capacity as Secretary of Health and
Human Services; and all other HHS-
affiliated defendants; U.S.
DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT; SCOTT
TURNER, in his official capacity as
Secretary of Housing and Urban
Development,

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
(401) 709-5000
Lauren.Zurier@usdoj.gov

Certification of Service

On this 14th day of October, 2025, I caused the within document to be filed electronically. It is available for viewing and downloading from the Court's ECF system, which will serve it upon all counsel of record.

/s/ Lauren S. Zurier

LAUREN S. ZURIER

Assistant United States Attorney