

**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

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

Plaintiffs respectfully submit this response to Defendants’ request for “additional time in which to comply with” the Court’s October 10, 2025 Order (ECF No. 73).

Defendants seek an extension of time to comply with two requirements in the Court’s order: the requirements (1) to provide written notice of the Order to agency employees by the end of the day tomorrow (paragraph 6) and (2) to file on the Court’s electronic docket a Status Report documenting the actions that they have taken to comply with the Order by the end of the day tomorrow (paragraph 7). Defendants do not seek an extension of time to comply with other aspects of the Court’s order—and no such extension would be warranted. Plaintiffs respectfully request that any order granting an extension make explicit that it only applies to the notice and reporting requirements in paragraphs 6 and 7.

Defendants seek an extension in light of (1) the parties’ plan to request that the Court clarify various aspects of the October 10 order, and (2) the government shutdown.

Plaintiffs oppose indefinitely extending Defendants’ notice and reporting obligations in light of the fact that the parties will seek clarification of certain aspects of the order. The existing order imposes clear obligations on Defendants, and requires Defendants to comply immediately. Defendants’ employees must receive notice so that they know their obligations under the order. That said, if, after the conference tomorrow, October 15, 2025, the Court indicates that it plans to issue a revised order in the near future, Plaintiffs do not object to briefly extending Defendants’ deadlines so that they need only provide notice (and the related status report) about the revised order.

As to the requested extension in light of the shutdown, Plaintiffs do not oppose a limited one- or two-day extension. No lengthier extension is warranted because, as Defendants implicitly acknowledge, the shutdown does not preclude them from providing the ordered notices. *See* U.S. Department of Justice FY 2026 Contingency Plan 3 (Sept. 29, 2025), <https://perma.cc/UNK2-F7SE> (explaining that, in a shutdown, agency employees may take actions to “comply with the court’s order,” as such an order “constitute[s] express legal authorization for the activity to continue”); *see also* October 1, 2025 Text Order denying Defendants’ Motion to Stay in Light of Lapse in Appropriations. But, as a professional courtesy, Plaintiffs do not oppose granting Defendants a limited extension to make necessary arrangements.

October 14, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 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/ Nina C. Cahill