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12 [Additional counsel not listed]

13 UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 AMERICAN FEDERATION OF
 GOVERNMENT EMPLOYEES, AFL-CIO,
 17 et al.,

18 Plaintiffs,

19 v.

20 UNITED STATES OFFICE OF
 21 MANAGEMENT AND BUDGET, et al.,

22 Defendants.

Case No. 3:25-cv-08302-SI

**DECLARATION OF DANIELLE
 LEONARD IN SUPPORT OF PLAINTIFFS'
 REQUEST FOR URGENT STATUS
 CONFERENCE AND FURTHER RELIEF**

DECLARATION OF DANIELLE LEONARD

I, Danielle Leonard, declare as follows:

1. I am over 18 years of age and competent to give this declaration. I am a partner at Altshuler Berzon LLP and counsel of record for all Plaintiffs in this case. I make this declaration on person knowledge of the facts stated here and if called as a witness in this action, I could and would testify competently to these facts.

2. Early on October 16, 2025, counsel for Plaintiffs learned from multiple credible sources that the U.S. Department of Interior was actively preparing a large-scale reduction in force (RIF) to terminate thousands of employees to commence Monday, October 20, 2025. This immediately raised concerns regarding compliance with this Court’s order. The sources included a journalist who claimed to have inside sources at the Department working on this RIF.

3. I therefore sent counsel for Defendants the following message:

We have received credible information from multiple sources that the Department of the Interior is planning to move forward with a widespread RIF starting on Monday, October 20, 2025. Please confirm either that 1) DOI is not going to issue any RIF notices next week; 2) If DOI is moving forward, on which date will it begin issuing RIF notices; and 3) if DOI is moving forward, exactly how DOI intends to comply with Judge Illston’s TRO, including a) the offices and programs that are subject to this RIF; and b) how DOI is identifying and excluding offices and programs that employ any of Plaintiffs’ members or bargaining units. If you cannot provide this information by the close of business today, pacific time, we intend to seek relief tomorrow from the Court.

A true and correct copy of my October 16 email and Defendants’ response is attached hereto as Ex.

A.

4. Counsel for Defendants did not confirm or deny the RIF plans or provide the requested information to confirm compliance with this Court’s TRO. Counsel responded:

Counsel – consistent with the Court’s order, we will produce the required information tomorrow.

Ex. A.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed October 14, 2025, in San Francisco, California.



Danielle Leonard

Exhibit A

From: Hedges, Elizabeth T (CIV) <Elizabeth.T.Hedges@usdoj.gov>
Sent: Thursday, October 16, 2025 1:31 PM
To: Danielle Leonard <dleonard@altshulerberzon.com>; Rosenberg, Brad (CIV) <Brad.Rosenberg@usdoj.gov>; Merritt, Robert C. (CIV) <Robert.C.Merritt@usdoj.gov>
Cc: Talia Stender <tstender@altshulerberzon.com>; BJ Chisholm <bchisholm@altshulerberzon.com>; Stacey Leyton <sleyton@altshulerberzon.com>; Alice Wang <awang@altshulerberzon.com>
Subject: RE: AFGE v. OMB (3:25-cv-08302-SI) Urgent re: DOI

Counsel – consistent with the Court’s order, we will produce the required information tomorrow.

Elizabeth (Betsey) Hedges
Counsel to the Assistant Attorney General, Civil Division
U.S. Department of Justice
(202) 616-0929 | (771) 209-1978
Elizabeth.T.Hedges@usdoj.gov

From: Danielle Leonard <dleonard@altshulerberzon.com>
Sent: Thursday, October 16, 2025 2:03 PM
To: Hedges, Elizabeth T (CIV) <Elizabeth.T.Hedges@usdoj.gov>; Rosenberg, Brad (CIV) <Brad.Rosenberg@usdoj.gov>; Merritt, Robert C. (CIV) <Robert.C.Merritt@usdoj.gov>

Cc: Talia Stender <tstender@altshulerberzon.com>; BJ Chisholm <bchisholm@altshulerberzon.com>; Stacey Leyton <sleyton@altshulerberzon.com>; Alice Wang <awang@altshulerberzon.com>
Subject: [EXTERNAL] RE: AFGE v. OMB (3:25-cv-08302-SI) Urgent re: DOI

Counsel-

We have received credible information from multiple sources that the Department of the Interior is planning to move forward with a widespread RIF starting on Monday, October 20, 2025. Please confirm either that 1) DOI is not going to issue any RIF notices next week; 2) If DOI is moving forward, on which date will it begin issuing RIF notices; and 3) if DOI is moving forward, exactly how DOI intends to comply with Judge Illston's TRO, including a) the offices and programs that are subject to this RIF; and b) how DOI is identifying and excluding offices and programs that employ any of Plaintiffs' members or bargaining units. If you cannot provide this information by the close of business today, pacific time, we intend to seek relief tomorrow from the Court.

Thank you,
Danielle

Danielle Leonard
Altshuler Berzon LLP
177 Post Street, Suite 300
San Francisco, California 94108
(415) 421-7151
Pronouns: she/her

ALTSHULER BERZON LLP

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