

1 Stacey M. Leyton (SBN 203827)
 2 Barbara J. Chisholm (SBN 224656)
 3 Danielle Leonard (SBN 218201)
 4 Alice X. Wang (SBN 335224)
 5 Robin S. Tholin (SBN 344845)
 6 Talia Stender (SBN 341654)
 7 ALTSHULER BERZON LLP
 8 177 Post Street, Suite 300
 9 San Francisco, CA 94108
 10 Tel.: (415) 421-7151
 11 sleyton@altber.com
 12 bchisholm@altber.com
 13 dleonard@altber.com
 14 awang@altber.com
 15 rtholin@altber.com
 16 tstender@altber.com

Attorneys for Plaintiffs

[Additional counsel and affiliations listed on signature page]

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

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

Plaintiffs,

v.

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

Defendants.

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

**PLAINTIFFS' URGENT REQUEST
 FOR STATUS CONFERENCE RE:
 COMPLIANCE WITH TRO AND FOR
 FURTHER RELIEF**

Complaint Filed: September 30, 2025

1 On Thursday, October 16, 2025, Plaintiffs learned from multiple credible sources that
2 Defendant the United States Department of the Interior (“DOI”) is planning to issue widespread
3 reduction-in-force notices on Monday, October 20, 2025, notwithstanding this Court’s October
4 15, 2025 Temporary Restraining Order (“TRO”), ECF 56. Counsel for Plaintiffs immediately
5 contacted Defendants’ counsel asking for confirmation or denial of DOI’s plans and further
6 requesting that, if DOI is planning an October 20 RIF, that counsel provide information
7 identifying the programs and offices affected and explaining how Defendants intend to comply
8 with this Court’s October 15, 2025 TRO staying any further RIFs that impact offices, projects,
9 and programs that employ Plaintiffs’ members or bargaining units. *See* Leonard Decl. Ex. A.

10 Counsel for Defendants responded without providing the information requested by
11 Plaintiffs. Counsel’s response stated only: “Counsel – consistent with the Court’s order, we will
12 produce the required information tomorrow.” *Id.*

13 The deadline set by this Court’s TRO for providing information about forthcoming RIFs
14 is 5 p.m. Pacific on Friday, October 17. ECF 56. Plaintiffs and other unions represent thousands
15 of employees at DOI, who are at risk of the same type of harm that this Court recognized in
16 granting the TRO. ECF 17-4 (Kelley Decl.). As a result of Defendants’ refusal to confirm or
17 deny whether DOI is currently preparing a large RIF beginning Monday, October 20, and if so,
18 whether and how it is ensuring compliance with this Court’s TRO, Plaintiffs have no choice but
19 to seek the following urgent relief from the Court to protect the federal employees threatened by
20 these actions.

21 First, Plaintiffs request that this Court advance the deadline for disclosure of planned
22 RIFs and the manner in which Defendants intend to comply with the TRO, with respect to DOI
23 and any other agency for which RIFs are planned to begin Monday, October 20, from 5 p.m. to
24 **11 a.m.** on October 17.

25 Second, Plaintiffs request that the Court set this case for an urgent status conference at 3
26 p.m. tomorrow, October 17 (at which time a case management conference in the *AFGE v. Trump*
27 case is already scheduled), or such other time tomorrow afternoon the Court is available.

28 Additionally, Plaintiffs provide notice that they intend to seek leave to amend their

1 current operative complaint to add additional union plaintiffs affected by the actual and
2 imminent shutdown RIFs. Plaintiffs had intended to file such papers with their preliminary
3 injunction motion on Tuesday, October 21. In light of the risk of impending mass terminations
4 at DOI, however, and Defendants' refusal to disclose whether DOI will issue RIFs and if so how
5 they will ensure compliance with the TRO, Plaintiffs will file their motion for leave to file an
6 amended complaint, to add as plaintiffs additional unions representing employees at DOI (and
7 other affected agencies), along with an emergency request to expand the TRO to protect the
8 employees that those unions represent, tomorrow morning.

9 Finally, if the information provided by Defendants 1) confirms that DOI is indeed
10 planning to issue widespread RIF notices on Monday, and 2) does not confirm with certainty that
11 anyone working in an office or program that employs Plaintiffs' members or bargaining units are
12 excluded from those RIF Notices, Plaintiffs will request to be heard at the status conference on
13 Friday afternoon on an urgent request to modify the TRO to stay DOI from issuing RIF notices
14 unless and until compliance with this Court's TRO is confirmed to this Court.¹

15
16 Dated: October 16, 2025

Respectfully submitted,

17
18 Stacey M. Leyton
19 Barbara J. Chisholm
20 Danielle E. Leonard
21 Alice X. Wang
22 Robin S. Tholin
23 Talia Stender
24 ALTSHULER BERZON LLP
25 177 Post St., Suite 300
26 San Francisco, CA 94108
Tel.: (415) 421-7151
Fax: (415) 362-8064
sleyton@altber.com
bchisholm@altber.com
dleonard@altber.com

27 ¹ If the Court declines to advance the deadline, Plaintiffs request an opportunity to be heard during the
28 upcoming weekend on a request for urgent injunctive relief if Defendants' 5 p.m. submission shows
the necessity for such relief, so that such relief may be obtained before the beginning of the Monday,
October 20 workday on the East Coast.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

awang@altber.com
rtholin@altber.com
tstender@altber.com

By: /s/ Danielle Leonard

Attorneys for All Plaintiffs

Elena Goldstein (pro hac vice)
DEMOCRACY FORWARD FOUNDATION
P.O. Box 34553
Washington, DC 20043
Tel: (202) 322-1959
egoldstein@democracyforward.org

Attorneys for All Plaintiffs

Norman L. Eisen (pro hac vice)
Craig Becker (pro hac vice)
DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE #15180
Washington, D.C. 20003
Tel: (202) 594-9958
Norman@democracydefenders.org
Craig@democracydefenders.org

Attorneys for All Plaintiffs

Rushab Sanghvi (SBN 302809)
AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO
80 F Street, NW
Washington, D.C. 20001
Tel: (202) 639-6426
Sanghr@afge.org

*Attorneys for Plaintiffs American Federation of
Government Employees, AFL-CIO (AFGE) and
AFGE locals*

Teague Paterson (SBN 226659)
AMERICAN FEDERATION OF STATE,
COUNTY, AND MUNICIPAL EMPLOYEES,
AFL-CIO
1625 L Street, N.W.
Washington, D.C. 20036
Tel: (202) 775-5900
TPaterson@afscme.org

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

*Attorneys for Plaintiff American Federation of State
County and Municipal Employees, AFL-CIO
(AFSCME)*