

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GORDON SCHIFF and CELESTE ROYCE,

Plaintiffs,

v.

**U.S. OFFICE OF PERSONNEL
MANAGEMENT; CHARLES EZELL**, in his
official capacity as Acting Director of the U.S.
Office of Personnel Management; **U.S.
DEPARTMENT OF HEALTH & HUMAN
SERVICES; ROBERT F. KENNEDY, JR.**, in
his official capacity as Secretary of Health and
Human Services; **AGENCY FOR
HEALTHCARE RESEARCH AND
QUALITY**; and **MAMATHA PANCHOLI**, in
her official capacity as Acting Director of the
Agency for Healthcare Research and Quality,

Defendants.

Case No. 25-cv-10595-LTS

SECOND DECLARATION OF ATTORNEY JOHN LANGFORD

I, John Langford, declare under penalty of perjury that the following is true and correct:

1. I am a Visiting Associate Clinical Professor of Law at Yale Law School and an attorney for Plaintiffs in this action. I offer this declaration in support of Plaintiffs' Reply Memorandum of Law in Support of Motion for a Preliminary Injunction.

2. On April 1, 2025, I filed a declaration in support of Plaintiffs' Motion for a Preliminary Injunction, attaching eighteen exhibits. *See* Doc. No. 26-1.

3. Attached as Plaintiffs' Exhibit 19 is a true and correct copy of an email sent from HHS Assistant Secretary for Public Affairs Thomas Corry to HHS employees on Friday, January 31, 2025, which was produced as part of the administrative record submitted by the government in *Doctors for America et al., v. OPM et al.*, 1:25-cv-00322-JDB (D.D.C.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 22, 2025, in New Haven, CT.



John Langford

EXHIBIT 19

From: Corry, Thomas (HHS/ASPA) <Thomas.Corry@hhs.gov>
Sent: Friday, January 31, 2025 5:01 PM
To: Corry, Thomas (OS) <Thomas.Corry@hhs.gov>
Cc: Nixon, Andrew (OS) <Andrew.Nixon@hhs.gov>; Spear, Stefanie (OS) <Stefanie.Spear@hhs.gov>
Subject: President Trump's Executive Order on Defending Women

All of you have received guidance on the implementation of President Trump's Executive Order titled Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.

As a reminder, please see the below list of actions related to communications that are required by the EO to be compliant. This must be completed by end of day today, 1/31/25.

1. Take down all outward facing media (websites, social media accounts, etc.) that inculcate or promote gender ideology.
2. Withdraw any final or pending documents, directives, orders, regulations, materials, forms, communications, statements, and plans that inculcate or promote gender ideology.
3. Cancel any trainings that inculcate or promote gender ideology or have done so in the past.
4. Review all agency forms that require entry of an individual's sex and ensure that all list male or female only, and not gender identity. Remove requests for "gender" and substitute requests for "sex."
5. Ensure that all applicable agency policies and documents, including forms, use the term "sex" and not "gender."

Following is language if you receive media inquiries:

On background: All changes to the HHS website and HHS division websites are in accordance with President Trump's January 20 Executive Orders, [Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government](#) and [Ending Radical And Wasteful Government DEI Programs And Preferencing](#). The Office of Personnel Management has provided initial guidance on both Executive Orders and HHS and divisions are acting accordingly to execute.

Please let me know if you have specific questions as you work to execute on President Trump's agenda.

Thomas Corry

Office of the Assistant Secretary for Public Affairs
U.S. Dept. of Health and Human Services
Mobile: (202) 431-0167