

Exhibit A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GORDON SCHIFF and,
CELESTE ROYCE,
Plaintiffs,

v.

Civil Action No. 1:25-CV-10595-LTS

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 S. PANCHOLI, in her official
capacity as Acting Director of the Agency for
Healthcare Research and Quality,

Defendants.

DECLARATION OF MARGIE SHOFER

I, Margie Shofer, do hereby state and declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am the Division Director of General Patient Safety at the Agency for Healthcare Research and Quality (“AHRQ”), an agency under the Department of Health and Human Services (“HHS”). I submit this declaration in connection with the Defendants’ Opposition to Plaintiffs’ Motion for Preliminary Injunction. The statements made herein are based on my personal knowledge and on information provided to me in the course of my official duties with HHS.
2. I have worked at HHS for almost 25 years, and I have been in my current position since July 24, 2016. Previously I served as Program Analyst in the Office of Communications (June 19,

2000- July 31, 2015), and a Health Scientist Administrator -non-supervisory (November 15, 2015-July 23, 2016).

3. The Agency for Healthcare Research and Quality conducts health services research. It is the nation's lead federal agency supporting patient safety research and supports state-of-the-art data analytics tools to analyze and improve the U.S. healthcare system. The Center for Quality Improvement and Patient Safety is responsible for preventing, mitigating and reducing medical errors and patient harm. PSNet is a national web-based resource featuring news and resources on patient safety. It is devoted to improving patient safety in the form of sharing original content developed by the contractor and content developed elsewhere such as peer reviewed journal articles and toolkits created outside of AHRQ.
4. One of my responsibilities as Division Director of General Patient Safety at AHRQ is to oversee work conducted by team members. In my supervisor role, I provide guidance on contracts managed by the team, including providing guidance to Pantheon, the contractor for AHRQ's Patient Safety Network website ("PSNet").
5. PSNet was launched in April 2005. As of September 2015, PSNet also hosted all previous AHRQ Morbidity and Mortality Rounds on the Web (WebM&M).
6. On March 24, 2025, HHS's contract with PSNet expired and was not renewed. PSNet is no longer an active website, and it is unable to accept any new content.
7. Prior to March 24, 2025, when PSNet was still an active website, content on PSNet was edited by a Technical Expert Panel team at the University of California, Davis, and American Institutes for Research, with technical support from the contractor, Pantheon.
8. Also prior to March 24, 2025, when PSNet was still an active website, the contractor, Pantheon, was responsible for maintaining PSNet and curating the content for PSNet. Only the contractor

could post content to PSNet. Members of the medical community who sought to post content onto PSNet were required to go through a vetting and editorial process with the PSNet Technical team and/or its selected outside subject matter experts.

9. Prior to March 24, 2025, anyone could join PSNet. Having a PSNet account allowed users to select preferences for the content they were most interested in and to track quizzes they take as part of web-based morbidity and mortality cases (which outline a patient safety error and discusses ways to prevent such an error in the future). However, users could never post opinions or any other content onto PSNet.
10. On January 31, 2025, I received an email from the Director of AHRQ's Center for Quality Improvement and Patient Safety, attaching a copy of an HHS Memo dated January 31, 2025, from the HHS Deputy Chief of Staff – Operations, and through the Acting Secretary of HHS, entitled: "Action: Initial Guidance Regarding President Trump's Executive Order *Defending Women*." ("HHS Memo"). That email provided a link to President Trump's *Defending Women* Executive Order ("EO") and also attached a copy of an OPM Memo, dated January 29, 2025, from the Acting Director of OPM, which was entitled "Initial Guidance Regarding President Trump's Executive Order *Defending Women*." ("OPM Memo").
11. The HHS Memo stated, that "All HHS Operating and Staff Divisions are expected to comply" with President Trump's January 20, 2025 Executive Order 14168 entitled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (Defending Women)* and OPM guidance "by taking prompt actions to end all agency programs that use taxpayer money to promote or reflect gender ideology as defined in Section 2(f) of *Defending Women*."
12. On January 31, 2025, Nicole Shulman, from AHRQ's Office of Communications ("OC")

sent an email to my team stating that given recent OPM guidance, OC was in the process of removing all web content that mentions gender and transgender topics. OC provided a preliminary list of links to content to be removed from PSNet. In an effort to comply with the OPM Memo, AHRQ's Office of Communications had run word searches through the articles in the PSNet database and identified a list of articles that contained terminology that potentially conflicted with the EO and OPM Memo's directives.

13. On January 31, 2025, I narrowed the list of the articles Ms. Shulman identified to include only that content that was associated with the issues outlined in the Executive Order.
14. Later that day, on January 31, 2025, my team sent the narrowed list of articles to Kendall Hall, Vice President of Health at Pantheon, advising that those articles needed to be taken down from PSNet.
15. Kendall Hall asked if it would be possible to come up with alternative content in the identified articles that would allow the articles to be republished on PSNet.
16. I agreed to try and explore the option of alternative content. Over the next few days, I worked with Kendall Hall to provide instructions and feedback to Dr. Patrick Romano, a subcontractor with Pantheon and also co-Editor in Chief of PSNet, regarding proposed modifications to the articles that had been identified.
17. Dr. Romano reached out to Dr. Gordon Schiff regarding his article "Multiple Missed Opportunities for Suicide Risk Assessment" ("Suicide Risk Assessment article"); and to Dr. Celeste Royce regarding her article "Endometriosis: A Common and Commonly Missed and Delayed Diagnosis" ("Endometriosis article").
18. With respect to the Suicide Risk Assessment article, Dr. Romano asked Dr. Schiff to eliminate the words "transgender" and "LGBTQ" from one sentence. Dr. Schiff declined.

19. With respect to the Endometriosis article, Dr. Romano asked Dr. Royce to modify her sentence “endometriosis can occur in trans and non-gender-conforming people” to eliminate reference to “trans” and “non-gender-conforming.” Dr. Royce proposed alternative language, namely: “it is important to note endometriosis can occur in any woman and is a rare but possible diagnosis in men.” Dr. Royce’s proposed language ultimately was not accepted.
20. Dr. Schiff’s and Dr. Royce’s commentaries were removed from PSNet on February 3, 2025.
21. On February 12, 2025, AHRQ’s Office of Communications asked me to confirm that weblinks on PSNet with content not aligned with the Executive order had been removed from PSNet, stating that the HHS Assistant Secretary for Public Affairs requested to know this information by that afternoon.
22. On March 24, 2025, HHS’s contract with Pantheon (under which Pantheon operated PSNet) ended. The contract was not renewed.
23. Because of the end of HHS’s contract with Pantheon, PSNet is no longer being operated or updated. As of April 7, 2025, AHRQ’s IT contractor is assessing their ability to host PSNet as a static website. At this point, it is unclear if there will be the technical ability to post any new content on PSNet and tagging the content to make it searchable.
24. Since March 24, 2025, and going forward, PSNet is a static website that is not accepting any new publications.

25. By the same token, PSNet is unable to accept re-published articles such as the commentaries by Dr. Schiff and Dr. Royce.

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

Dated: April 11, 2025

MARJORIE J. SHOFER Digitally signed by MARJORIE J.
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Date: 2025.04.11 10:10:12 -04'00'

Margie Shofer

Exhibit B

Presidential Documents

Executive Order 14168 of January 20, 2025

Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government

By the authority vested in me as President by the Constitution and the laws of the United States of America, including section 7301 of title 5, United States Code, it is hereby ordered:

Section 1. Purpose. Across the country, ideologues who deny the biological reality of sex have increasingly used legal and other socially coercive means to permit men to self-identify as women and gain access to intimate single-sex spaces and activities designed for women, from women's domestic abuse shelters to women's workplace showers. This is wrong. Efforts to eradicate the biological reality of sex fundamentally attack women by depriving them of their dignity, safety, and well-being. The erasure of sex in language and policy has a corrosive impact not just on women but on the validity of the entire American system. Basing Federal policy on truth is critical to scientific inquiry, public safety, morale, and trust in government itself.

This unhealthy road is paved by an ongoing and purposeful attack against the ordinary and longstanding use and understanding of biological and scientific terms, replacing the immutable biological reality of sex with an internal, fluid, and subjective sense of self unmoored from biological facts. Invalidating the true and biological category of "woman" improperly transforms laws and policies designed to protect sex-based opportunities into laws and policies that undermine them, replacing longstanding, cherished legal rights and values with an identity-based, inchoate social concept.

Accordingly, my Administration will defend women's rights and protect freedom of conscience by using clear and accurate language and policies that recognize women are biologically female, and men are biologically male.

Sec. 2. Policy and Definitions. It is the policy of the United States to recognize two sexes, male and female. These sexes are not changeable and are grounded in fundamental and incontrovertible reality. Under my direction, the Executive Branch will enforce all sex-protective laws to promote this reality, and the following definitions shall govern all Executive interpretation of and application of Federal law and administration policy:

(a) "Sex" shall refer to an individual's immutable biological classification as either male or female. "Sex" is not a synonym for and does not include the concept of "gender identity."

(b) "Women" or "woman" and "girls" or "girl" shall mean adult and juvenile human females, respectively.

(c) "Men" or "man" and "boys" or "boy" shall mean adult and juvenile human males, respectively.

(d) "Female" means a person belonging, at conception, to the sex that produces the large reproductive cell.

(e) "Male" means a person belonging, at conception, to the sex that produces the small reproductive cell.

(f) "Gender ideology" replaces the biological category of sex with an ever-shifting concept of self-assessed gender identity, permitting the false claim that males can identify as and thus become women and vice versa, and requiring all institutions of society to regard this false claim as true.

Gender ideology includes the idea that there is a vast spectrum of genders that are disconnected from one's sex. Gender ideology is internally inconsistent, in that it diminishes sex as an identifiable or useful category but nevertheless maintains that it is possible for a person to be born in the wrong sexed body.

(g) "Gender identity" reflects a fully internal and subjective sense of self, disconnected from biological reality and sex and existing on an infinite continuum, that does not provide a meaningful basis for identification and cannot be recognized as a replacement for sex.

Sec. 3. *Recognizing Women Are Biologically Distinct From Men.* (a) Within 30 days of the date of this order, the Secretary of Health and Human Services shall provide to the U.S. Government, external partners, and the public clear guidance expanding on the sex-based definitions set forth in this order.

(b) Each agency and all Federal employees shall enforce laws governing sex-based rights, protections, opportunities, and accommodations to protect men and women as biologically distinct sexes. Each agency should therefore give the terms "sex", "male", "female", "men", "women", "boys" and "girls" the meanings set forth in section 2 of this order when interpreting or applying statutes, regulations, or guidance and in all other official agency business, documents, and communications.

(c) When administering or enforcing sex-based distinctions, every agency and all Federal employees acting in an official capacity on behalf of their agency shall use the term "sex" and not "gender" in all applicable Federal policies and documents.

(d) The Secretaries of State and Homeland Security, and the Director of the Office of Personnel Management, shall implement changes to require that government-issued identification documents, including passports, visas, and Global Entry cards, accurately reflect the holder's sex, as defined under section 2 of this order; and the Director of the Office of Personnel Management shall ensure that applicable personnel records accurately report Federal employees' sex, as defined by section 2 of this order.

(e) Agencies shall remove all statements, policies, regulations, forms, communications, or other internal and external messages that promote or otherwise inculcate gender ideology, and shall cease issuing such statements, policies, regulations, forms, communications or other messages. Agency forms that require an individual's sex shall list male or female, and shall not request gender identity. Agencies shall take all necessary steps, as permitted by law, to end the Federal funding of gender ideology.

(f) The prior Administration argued that the Supreme Court's decision in *Bostock v. Clayton County* (2020), which addressed Title VII of the Civil Rights Act of 1964, requires gender identity-based access to single-sex spaces under, for example, Title IX of the Educational Amendments Act. This position is legally untenable and has harmed women. The Attorney General shall therefore immediately issue guidance to agencies to correct the misapplication of the Supreme Court's decision in *Bostock v. Clayton County* (2020) to sex-based distinctions in agency activities. In addition, the Attorney General shall issue guidance and assist agencies in protecting sex-based distinctions, which are explicitly permitted under Constitutional and statutory precedent.

(g) Federal funds shall not be used to promote gender ideology. Each agency shall assess grant conditions and grantee preferences and ensure grant funds do not promote gender ideology.

Sec. 4. *Privacy in Intimate Spaces.* (a) The Attorney General and Secretary of Homeland Security shall ensure that males are not detained in women's prisons or housed in women's detention centers, including through amendment, as necessary, of Part 115.41 of title 28, Code of Federal Regulations and interpretation guidance regarding the Americans with Disabilities Act.

(b) The Secretary of Housing and Urban Development shall prepare and submit for notice and comment rulemaking a policy to rescind the final rule entitled “Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs” of September 21, 2016, 81 FR 64763, and shall submit for public comment a policy protecting women seeking single-sex rape shelters.

(c) The Attorney General shall ensure that the Bureau of Prisons revises its policies concerning medical care to be consistent with this order, and shall ensure that no Federal funds are expended for any medical procedure, treatment, or drug for the purpose of conforming an inmate’s appearance to that of the opposite sex.

(d) Agencies shall effectuate this policy by taking appropriate action to ensure that intimate spaces designated for women, girls, or females (or for men, boys, or males) are designated by sex and not identity.

Sec. 5. *Protecting Rights.* The Attorney General shall issue guidance to ensure the freedom to express the binary nature of sex and the right to single-sex spaces in workplaces and federally funded entities covered by the Civil Rights Act of 1964. In accordance with that guidance, the Attorney General, the Secretary of Labor, the General Counsel and Chair of the Equal Employment Opportunity Commission, and each other agency head with enforcement responsibilities under the Civil Rights Act shall prioritize investigations and litigation to enforce the rights and freedoms identified.

Sec. 6. *Bill Text.* Within 30 days of the date of this order, the Assistant to the President for Legislative Affairs shall present to the President proposed bill text to codify the definitions in this order.

Sec. 7. *Agency Implementation and Reporting.* (a) Within 120 days of the date of this order, each agency head shall submit an update on implementation of this order to the President, through the Director of the Office of Management and Budget. That update shall address:

(i) changes to agency documents, including regulations, guidance, forms, and communications, made to comply with this order; and

(ii) agency-imposed requirements on federally funded entities, including contractors, to achieve the policy of this order.

(b) The requirements of this order supersede conflicting provisions in any previous Executive Orders or Presidential Memoranda, including but not limited to Executive Orders 13988 of January 20, 2021, 14004 of January 25, 2021, 14020 and 14021 of March 8, 2021, and 14075 of June 15, 2022. These Executive Orders are hereby rescinded, and the White House Gender Policy Council established by Executive Order 14020 is dissolved.

(c) Each agency head shall promptly rescind all guidance documents inconsistent with the requirements of this order or the Attorney General’s guidance issued pursuant to this order, or rescind such parts of such documents that are inconsistent in such manner. Such documents include, but are not limited to:

(i) “The White House Toolkit on Transgender Equality”;

(ii) the Department of Education’s guidance documents including:

(A) “2024 Title IX Regulations: Pointers for Implementation” (July 2024);

(B) “U.S. Department of Education Toolkit: Creating Inclusive and Non-discriminatory School Environments for LGBTQI+ Students”;

(C) “U.S. Department of Education Supporting LGBTQI+ Youth and Families in School” (June 21, 2023);

(D) “Departamento de Educación de EE.UU. Apoyar a los jóvenes y familias LGBTQI+ en la escuela” (June 21, 2023);

(E) “Supporting Intersex Students: A Resource for Students, Families, and Educators” (October 2021);

(F) “Supporting Transgender Youth in School” (June 2021);

(G) “Letter to Educators on Title IX’s 49th Anniversary” (June 23, 2021);

(H) “Confronting Anti-LGBTQI+ Harassment in Schools: A Resource for Students and Families” (June 2021);

(I) “Enforcement of Title IX of the Education Amendments of 1972 With Respect to Discrimination Based on Sexual Orientation and Gender Identity in Light of *Bostock v. Clayton County*” (June 22, 2021);

(J) “Education in a Pandemic: The Disparate Impacts of COVID-19 on America’s Students” (June 9, 2021); and

(K) “Back-to-School Message for Transgender Students from the U.S. Depts of Justice, Education, and HHS” (Aug. 17, 2021);

(iii) the Attorney General’s Memorandum of March 26, 2021 entitled “Application of *Bostock v. Clayton County* to Title IX of the Education Amendments of 1972”; and

(iv) the Equal Employment Opportunity Commission’s “Enforcement Guidance on Harassment in the Workplace” (April 29, 2024).

Sec. 8. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

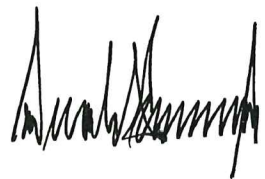
(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

(d) If any provision of this order, or the application of any provision to any person or circumstance, is held to be invalid, the remainder of this order and the application of its provisions to any other persons or circumstances shall not be affected thereby.



THE WHITE HOUSE,
January 20, 2025.

Exhibit C



The Director

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

MEMORANDUM

TO: Heads and Acting Heads of Departments and Agencies

FROM: Charles Ezell, Acting Director, U.S. Office of Personnel Management

DATE: January 29, 2025

RE: Initial Guidance Regarding President Trump's Executive Order *Defending Women*.

Pursuant to its authority under 5 U.S.C. § 1103(a)(1) and (a)(5), the U.S. Office of Personnel Management (OPM) is providing the following initial guidance to agencies regarding the President's Executive Order entitled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (Defending Women)*.

Steps to End Federal Funding of Gender Ideology: In light of *Defending Women*, each agency should take prompt actions to end all agency programs that use taxpayer money to promote or reflect gender ideology as defined in Section 2(f) of *Defending Women*. Specifically, agency heads should take the following steps:

1. No later than **5:00 p.m. EST on Friday, January 31, 2025**
 - a. Send an email to all agency employees announcing that the agency will be complying with *Defending Women* and this guidance.
 - b. Review all agency programs, contracts, and grants, and terminate any that promote or inculcate gender ideology.
 - c. Review all agency position descriptions and send a notification to all employees whose position description involves inculcating or promoting gender ideology that they are being placed on paid administrative leave effective immediately as the agency takes steps to close/end all initiatives, offices, and programs that inculcate or promote gender ideology.
 - d. Take down all outward facing media (websites, social media accounts, etc.) that inculcate or promote gender ideology.
 - e. Review agency email systems such as Outlook and turn off features that prompt users for their pronouns.

- f. Withdraw any final or pending documents, directives, orders, regulations, materials, forms, communications, statements, and plans that inculcate or promote gender ideology.
 - g. Cancel any trainings that inculcate or promote gender ideology or have done so in the past.
 - h. Disband or cancel any employee resource groups or special emphasis programs that inculcate or promote gender ideology or have done so in the past.
 - i. 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."
 - j. Ensure that all applicable agency policies and documents, including forms, use the term "sex" and not "gender."
 - k. Ensure that intimate spaces designated for women, girls, or females (or for men, boys, or males) are designated by biological sex and not gender identity.
2. No later than **12:00 p.m. EST on Friday, February 7, 2025**, report to OPM on all steps taken to implement this guidance, including:
- a. a complete list of actions taken in response to this guidance and *Defending Women*; and
 - b. any agency plans to fully comply with this guidance and *Defending Women*.

Please contact OPM at defendingwomen@opm.gov if you have any questions regarding this guidance. Please send any reports requested by this guidance to defendingwomen@opm.gov.

cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, Human Resources Directors, and Chiefs of Staff

Exhibit D



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary

Washington, D.C. 20201

TO: Heads of Operating Divisions
Heads of Staff Divisions

THROUGH: Dorothy A. Fink, M.D., Acting Secretary

FROM: Scott W. Rowell, Deputy Chief of Staff - Operations

DATE: January 31, 2025

SUBJECT: Action: Initial Guidance Regarding President Trump's Executive Order
Defending Women

ACTION REQUESTED

On January 20, 2025, President Trump issued Executive Order 14168, entitled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government (Defending Women)*. The U.S. Office of Personnel Management (OPM) provided initial guidance to agencies regarding implementation of *Defending Women*. HHS considers sex as a biological variable and is committed to ensuring the health and safety of women across the lifespan.

All HHS Operating and Staff Divisions are expected to comply with *Defending Women* and OPM guidance by taking prompt actions to end all agency programs that use taxpayer money to promote or reflect gender ideology as defined in Section 2(f) of *Defending Women*. The **Coordinating Committee on Women's Health** is leading this data call on behalf of the Department. Attached is the reporting template for Operating and Staff Divisions to complete and return through Executive Secretariats by **12:00 p.m. EST on February 6, 2025**.

HHS Operating and Staff Divisions shall review all official agency activities that consider sex as a biological variable and have been or will be updated to comply with this order where official agency activities do not consider sex as a biological variable. Operating and Staff Divisions will be contacted by ASA, ASPA, and ASFR to address reporting requirements for grants, contracts, web-related activities, and human resources. The attached template shall be used to gather programmatic information related but not limited to statutes, regulations, guidance, intramural research, policies, public education documents and campaigns, communications, and events (internal to HHS and external to HHS). Reporting also shall include Federal Advisory Committee Act (FACA) committees, other internal and external committees, and working groups. Where appropriate, Operating and Staff Divisions shall address current or prior rulemaking to ensure compliance with the executive order. HHS Operating and Staff Divisions shall submit a report bi-weekly regarding implementation until all necessary actions have been completed.

We appreciate your timely response to this request.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary

SCOTT W.
ROWELL -S

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Scott W. Rowell, Deputy Chief of Staff - Operations

Attachments

TAB A: Reporting Template – Defending Women

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOCTORS FOR AMERICA, et al.

Plaintiffs,

v.

OFFICE OF PERSONNEL
MANAGEMENT, et al.

Defendants.

Civil Action No. 25-cv-322-JDB

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR A PRELIMINARY
INJUNCTION AND EXPEDITED SUMMARY JUDGMENT**

Upon consideration of Plaintiffs' motion for a preliminary injunction and expedited summary judgment, the opposition thereto, and the full record in this case, it is hereby

ORDERED that Plaintiffs' motion is **GRANTED**.

And it is further **DECLARED** that the Office of Personnel Management (OPM) memorandum "Initial Guidance Regarding President Trump's Executive Order Defending Women" exceeded OPM's statutory authority and was arbitrary and capricious; and it is further

DECLARED that the adoption by the Department of Health and Human Services, including its component agencies, (collectively, Health Agency Defendants) of a new policy requiring removal or modification of webpages and datasets that it identifies as promoting "gender ideology" was arbitrary and capricious; and it is further

DECLARED that the Health Agency Defendants' removal of webpages and datasets violates the Paperwork Reduction Act of 1995, the Evidence-Based Policymaking Act of 2018 and its regulations, and the Administrative Procedure Act; and it is further

ORDERED that the Health Agency Defendants shall restore to the versions posted as of January 29, 2025, webpages and datasets that they removed or modified, or that they directed to have removed or modified, in response to the OPM memorandum or without reasoned justification; and it is further

ORDERED that for statistical products that were restored in response to this Court's orders, the Health Agency Defendants shall remove disclaimers added to those webpages; and it is further

ORDERED that the Health Agency Defendants are **ENJOINED** from further enforcing a policy requiring removal of all outward facing media, including webpages and datasets, in whole or in part, that the agencies identify as promoting "gender ideology."

SO ORDERED.

JOHN D. BATES
UNITED STATES DISTRICT JUDGE

Dated: _____, 2025