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14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17	COMMUNITY LEGAL SERVICES IN EAST )	Case No. 3:25-cv-02847-AMO
18	PALO ALTO, )	
19	Plaintiffs, )	<b>DEFENDANTS' STATUS REPORT AND</b>
20	v. )	<b>NOTICE OF COMPLIANCE</b>
21	UNITED STATES DEPARTMENT OF )	
22	HEALTH AND HUMAN SERVICES, <i>ET AL.</i> , )	
23	Defendants. )	
24	_____ )	

1 **DEFENDANTS’ STATUS REPORT AND NOTICE OF COMPLIANCE**

2 Pursuant to the Court’s April 7, 2025 Order (ECF No. 42), Defendants submit this Status Report  
3 to detail the steps taken to comply with the Court’s Temporary Restraining Order (“TRO”) issued on April  
4 1, 2025 (ECF No. 33).

5 **I. Background**

6 The TRO enjoined Defendants from withdrawing the services or funds provided by the Office of  
7 Refugee Resettlement (“ORR”) as of March 20, 2025, under the Trafficking Victims Protection  
8 Reauthorization Act of 2008 (“TVPRA”), 8 U.S.C. § 1232(c)(5), and ORR’s Foundational Rule, 45 C.F.R.  
9 § 410.1309(a)(4), particularly ORR’s provision of funds for direct legal representation services to  
10 unaccompanied children. The Court further directed Defendants to restore the relevant funding and  
11 services as they existed prior to March 21, 2025. *Id.* The TRO was effective as of April 2, 2025, at 11:00  
12 a.m. EST and remains in effect through April 16, 2025, at 10:59 a.m. EST. *Id.*

13 **II. Compliance Steps Taken**

14  
15 Upon learning of the TRO on April 2, 2025, ORR took immediate steps to develop a compliance  
16 plan. Ex. A, Declaration of Toby Biswas (“Biswas Decl.”), ¶ 4. The plan involved restoring the  
17 terminated contract line items (“CLINs”) for direct legal representation, recruitment of pro bono attorneys,  
18 and expansion of direct representation that had been eliminated on March 21, 2025. Biswas Decl. ¶¶ 6 –  
19 7.

20  
21 On April 3, 2025, ORR took steps to rescind the partial termination of the Acacia contract and  
22 restoring CLINs 2 through 4. Biswas Decl. ¶ 8. ORR determined that additional funds would be necessary  
23 to cover the reinstated services for the entire duration of the six-month contract extension. Biswas Decl.  
24 ¶ 8.

25  
26 On April 3, 2025, ORR transferred funds to the Department of the Interior (“DOI”), which serves  
27 as the contracting agent through its Interior Business Center, via the G-Invoicing system to fund the  
28 restored CLINs. Biswas Decl. ¶ 8; *see* ECF No. 24-1, ¶ 13. DOI, as the contracting agency, must now

1 complete the modification of the Acacia contract. Biswas Decl. ¶¶ 9 – 10. This is because the Acacia  
2 contract is formally between DOI and Acacia; ORR is not a party to the contract, but acts as a “client”  
3 under the interagency agreement. Similarly, only DOI, as the awarding agency, can execute major actions  
4 like terminations and modifications, even though ORR retains substantive authority over programmatic  
5 decisions.

6  
7 **III. Current Status**

8 As of April 7, 2025, ORR has completed all internal steps necessary for compliance, including  
9 approval of the decision memo and funding transfer. Biswas Decl. ¶¶ 8 – 10. DOI is currently finalizing  
10 the contract modification to restore the terminated CLINs. Defendants are awaiting DOI’s final approval  
11 and execution of the contract changes.

12 **CONCLUSION**

13  
14 Defendants respectfully submit that they have taken all feasible steps to comply with the TRO to  
15 date and will continue to work with DOI to complete the remaining actions necessary to restore funding  
16 and services in compliance with the court’s TRO.

1 DATED: April 8, 2025

Respectfully submitted,

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19 **CERTIFICATE OF COMPLIANCE**

20 The undersigned, counsel of record for Defendants certifies that this Status Report contains 2  
21 pages, which complies with the word limit of this Court’s Standing Order, section 6 and L.R. 11-6.1. All  
22 counsel of record were served a copy of this status report electronically via ECF.

23  
24 Respectfully submitted,

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