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

Case No. 3:25-cv-1780-WHA

17 AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, <i>et al.</i>

18 Plaintiffs,

20 v.

21 UNITED STATES OFFICE OF PERSONNEL MANAGEMENT, <i>et al.</i> ,

22 Defendants.

**DECLARATION OF TREVOR NORRIS IN
SUPPORT OF DEFENDANTS’ MOTION
FOR STAY OF MARCH 13, 2025, ORDER**

1 I, Trevor Norris, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am Deputy Assistant Secretary (DAS) for Human Resources (HR) for the United
3 States Department of the Treasury, headquartered in Washington, D.C. I have served in this
4 position since October 2017.

5 2. As DAS for HR, I oversee all human capital programs for the Department of the
6 Treasury and its bureaus (collectively, “Treasury”). I have the responsibility for tracking and
7 recording personnel actions, including terminations.

8 3. Based on my roles and responsibilities, I am familiar with the number of
9 separated probationary Treasury employees affected by the Court’s March 13, 2025, Order.

10 4. Treasury separated 7,605 probationary employees between February 19 and
11 March 7, 2025.

12 5. The Court’s order requiring reinstatement of these terminated employees will
13 impose substantial burdens on Treasury, cause significant confusion, and potentially subject
14 terminated employees to extreme whiplash.

15 6. Treasury would face several administrative challenges in returning terminated
16 probationary employees to the rolls and onboarding them. These include developing official
17 notice to mail and/or email to affected employees; processing back pay; restoration of benefits;
18 issuing equipment; putting the individuals back into personnel systems; finding work space since
19 the Agency has executed a return to office as of March 10, 2025; allowing building access; re-
20 credentialing; and reallocation of work.

21 7. Offers of reinstatement will also cause confusion for agency and employee alike.
22 Employees who were terminated just weeks ago will be offered reinstatement. Yet an appellate
23 ruling could reverse the district court’s order before terminated employees accept their
24 reinstatement or before they reenter on the job. Treasury could withdraw any offers of
25 reinstatement in that circumstance. And even if the employees are reinstated prior to any reversal
26 of the district court’s order, the reinstated employees will remain on probation and could again
27 be terminated. Further, in response to President Trump’s February 11, 2025, Executive Order
28 *Implementing the President’s “Department of Government Efficiency” Workforce Optimization*

1 *Initiative*, Treasury has submitted Phase 1 of its Agency Reduction in Force and Reorganization
2 Plan (ARRP) to the Office of Management and Budget and Office of Personnel Management.
3 This plan contemplates significant personnel reductions in Treasury bureaus under Reduction in
4 Force procedures that will almost certainly result in subsequent removal of an unknown number
5 of these probationary employees. In short, employees could be subjected to multiple changes in
6 their employment status in a matter of weeks.

7 8. The uncertainty associated with this situation would challenge supervisors in
8 effectively managing their workforce. Work schedules and assignments would effectively be tied
9 to hearing and briefing schedules set by the courts. It would be difficult to assign new work to
10 reinstated employees considering the uncertainty over their future status.

11
12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
13 and correct.

14 Dated: March 14, 2025

15
16 **John T.** Digitally signed
17 **Norris** by John T. Norris
Date: 2025.03.14
13:20:05 -04'00'
18

J. Trevor Norris