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17 **UNITED STATES DISTRICT COURT FOR THE**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

19
 20 AMERICAN FEDERATION OF
 21 GOVERNMENT EMPLOYEES, AFL-CIO,
 et al.,

22 Plaintiffs,

23 v.

24
 25 UNITED STATES OFFICE OF
 26 MANAGEMENT AND BUDGET, et al.,

27 Defendants.

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

DECLARATION OF REESHA TRZNADEL

Hearing Date: October 28, 2025
 Time: 10:30 a.m.
 Judge: Hon. Susan Illston
 Place: San Francisco Courthouse
 Courtroom 01

1 Pursuant to 28 U.S.C. § 1746, I, Reesha Trznadel, declare, pursuant to 28 U.S.C. § 1746,
2
3 as follows:

- 4 1. I am the acting Chief Human Capital Officer at the U.S. Department of Energy (DOE),
5 headquartered in Washington, D.C. I have served in this position since February 27,
6 2025.
- 7
8 2. In my role, I am responsible for personnel management. I have the responsibility for
9 tracking and recording personnel actions, including Reductions-in-Force (RIFs). I assist
10 in ensuring that all personnel actions comply with court orders and federal law.
- 11 3. Plaintiffs in this lawsuit include two national unions, AFGE and AFSCME, and two local
12 California-based chapters, AFGE Local 1236 and AFGE Local 3172.
- 13
14 4. I am aware of and have reviewed the October 15, 2025, temporary restraining order
15 (TRO) issued by the Court in this action.
- 16 5. I make this declaration in response to the Court’s Order of October 15, 2025, which
17 granted Plaintiffs temporary injunctive relief and restrained Defendants from taking
18 certain actions related to RIFs.
- 19
20 6. The Court’s TRO provides that Defendants are restrained from:
 - 21 1) taking any action to issue any Reduction in Force (“RIF”) notices to federal
22 employees in any PPA (program, project, or activity) that includes any
23 bargaining unit or member represented by any Plaintiff during or because of
24 the federal government shutdown, including but not limited to by taking any
25 action to implement or enforce the OMB Lapse Memorandum (dated
26 September 24, 2025), the portions of the related OPM Guidance for Shutdown
27 Furloughs (as revised September 28, 2025), the related OPM “Special
28 Instructions for Agencies Affected by a Possible Lapse in Appropriations
Starting on October 1, 2025” (dated September 28, 2025), or any other
decision or directive that purports to authorize or require issuance of RIF
notices during a shutdown;

2) taking any further action to administer or implement any RIF notices already issued beginning on October 10, 2025 to federal employees in any PPA (program, project, or activity) that includes any bargaining unit or member represented by any Plaintiff, including but not limited to by requiring federal employees to perform work to further administer or implement RIF notices and by enforcing or counting any days towards any period of notice with respect to those notices (i.e., the effective date of the RIF shall be stayed and Defendants shall therefore toll the running of all RIF notice periods).

7. The Court’s Order also requires Defendants to report certain information by 11:00 A.M. PDT on October 17, 2025.

a. Defendants shall serve and file an accounting of all RIFs, actual or imminent, that are enjoined by this TRO, including but not limited to a description of the agency that imposed or is planning to impose the enjoined RIF, the number of employees included in the enjoined RIF, and description of the PPAs that Defendants included in the enjoined RIF.

3) Each Defendant shall file a declaration(s) verifying that they have complied with this Order and the steps they have taken to do so.

4) The Department of Energy has not issued any specific RIF notices implicated by the Court’s TRO. The Department will not proceed with any RIFs prohibited by the TRO for as long as the TRO remains in force, absent an order from a higher court providing relief.¹

8. The agency has taken the following actions to comply with the TRO.

a. DOE sent notice of the TRO to the impacted human resources office on October 15, 2025.

b. DOE issued general RIF notices, which did not include an effective date for the RIF action. As a result, DOE did not have an obligation to post information regarding the TRO or staying the effective date of the RIF.

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

Dated: October 17, 2025

Reesha Trznadel

¹ DOE interprets the term PPA for purposes of the Court’s TRO the same way DOE interpreted the term as used in the OMB Lapse Email.