

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

AMERICAN FOREIGN SERVICE  
ASSOCIATION, *et al.*,

Plaintiffs,

v.

PRESIDENT DONALD TRUMP, *et al.*,

Defendants.

Civil Action No. 1:25-cv-00352-CJN

**NOTICE OF CORRECTION**

At the hearing on February 7, 2025, held approximately three hours after the TRO motion was filed, counsel for Defendants made two factual representations in good faith on the basis of facts provided by Defendants immediately prior to the hearing that require correction after receiving additional information from Defendants in the days following the hearing.

With the benefit of more time to review available data over the weekend, Defendants came to understand that more than 500 employees were placed on administrative leave prior to February 7 and notified counsel for Defendants of this new information after the Court had entered the Order. As explained in the recently filed declaration, approximately 2,140 employees had been placed on administrative leave by the time of the TRO hearing. *See* Decl. of Peter Marocco, ECF No. 20-1, ¶ 12. In compliance with the Court’s temporary restraining order, all of these employees were removed from administrative leave. *Id.* ¶ 18.

Additionally, although Secretary Rubio’s January 24, 2025 directive only froze future contract obligations, *id.* ¶ 3, payments on existing contracts were paused as well as part of efforts by agency leadership to regain control of the organization’s spending and conduct a comprehensive

review of its programs. *See id.* ¶¶ 5–10. Counsel for Defendants was unaware of this development prior to the hearing.

Defendants sincerely regret these inadvertent misstatements based on information provided to counsel immediately prior to the hearing and have made every effort to provide reliable information in the declaration supporting their opposition to a preliminary injunction.

Dated: February 10, 2025

Respectfully submitted,

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