

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

GLOBAL HEALTH COUNCIL, *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, *et al.*,

*Defendants.*

Civil Action No. 25-cv-402 (AHA)

**RESPONSE TO COURT'S REQUEST FOR  
INFORMATION REGARDING OUTSTANDING INVOICES**

At the hearing on March 6, 2025, the Court requested that Plaintiffs provide information concerning their outstanding invoices, as well as those of the associational Plaintiffs' members who agree to be identified to the government, in order to assist the Court in setting appropriate benchmarks and milestones for Defendants' compliance with the Court's TRO and February 25, 2025 Order.

Based on information collected overnight and compiled this morning, Plaintiffs report that, as of today, they and those of their members who have agreed to be identified to the government have approximately 1,200 invoices outstanding for work performed before February 13, 2025. These invoices total approximately \$420 million.

Plaintiffs and their members also have a significant number of unfulfilled letter-of-credit drawdown requests, exceeding a total of \$250 million. Based on statements made by both parties at the hearing, however, we understand that it is undisputed that letter of credit drawdown and reimbursement requests are not subject to any pre-approval processes (they are reviewed after the fact); the government should be able to restore access immediately.

Dated: March 7, 2025

Respectfully submitted,

/s/ Sally L. Pei

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\*application for admission pending

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