

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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

Plaintiffs,

vs.

CHARLES EZELL, ACTING
DIRECTOR, OFFICE OF PERSONNEL
MANAGEMENT, et al..

Defendants.

Civil Action No. 25-cv-10276

MOTION FOR CLARIFICATION OF ORDER

Plaintiffs respectfully move the Court for clarification of its order, ECF No. 60. Therein, the Court stated: “The Court orders that the current stay of the February 6, 2025, deadline to remain in effect until further order of the Court. Matter taken under advisement.”

Plaintiffs request the Court clarify that Defendants must notify the federal employees that received the Fork in the Road directive that the deadline is stayed pending further order of the Court as soon as practicable today, February 10, 2025—just as the Court so ordered in issuing the underlying order on February 6, 2025. Otherwise, some members of the federal workforce might not receive notice of the extended stay of the deadline.

CERTIFICATE OF COMPLIANCE

[Local Rule 7.1]

Pursuant to Local Rule 7.1(a) and Federal Rule of Civil Procedure 65, counsel for Plaintiffs certify that they have sent—through Defendants’ counsel notice of this motion. In light of the emergency character of this motion it has been impractical to meet and confer with Defendants counsel, but Plaintiffs seek such a conference if Defendant believes a resolution is possible.

Respectfully submitted,

DATED this 10th day of February, 2025.

By: /s/ Elena Goldstein
Elena Goldstein* (NY Bar No. 4210456)
Michael C. Martinez* (D.C. Bar No.
1686872)
Daniel McGrath* (D.C. Bar No.
1531723)
Skye Perryman* (D.C. Bar No. 984573)
DEMOCRACY FORWARD
FOUNDATION
P.O. Box 34553
Washington, D.C. 20043
Telephone: (202) 448-9090
Facsimile: 202-796-4426
egoldstein@democracyforward.org
mmartinez@democracyforward.org
dmcgrath@democracyforward.org
sperryman@democracyforward.org
Counsel for Plaintiffs

Michael T. Anderson (BBO #645533)
Nicolas Mendoza (BBO #703711)
MURPHY ANDERSON PLLC
1401 K Street N.W., Suite 300
Washington, DC 20005
Telephone: (202) 223-2620
manderson@murphypllc.com
nmendoza@murphypllc.com
Counsel for Plaintiffs

Teague P. Paterson* (D.C. Bar No.
144528)
Matthew S. Blumin* (D.C. Bar No.
144528)
AMERICAN FEDERATION OF
STATE, COUNTY, AND MUNICIPAL
EMPLOYEES, AFL-CIO
1625 L Street N.W.
Washington, DC 20036
Telephone: (202) 775-5900
Facsimile: (202) 452-0556
tpaterson@afscme.org

mblumin@afscme.org

*Counsel for American Federation of
State, County, and Municipal Employees,
AFL-CIO (AFSCME)*

Rushab B. Sanghvi* (D.C. Bar No.
1012814)

Andres M. Grajales* (D.C. Bar No.
476894)

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-
CIO

80 F Street N.W.

Washington, DC 20001

Telephone: (202) 639-6426

Facsimile: (202) 329-2928

SanghR@afge.org

GrajaA@afge.org

*Counsel for Plaintiff American
Federation*

*of Government Employees, AFL-CIO
(AFGE) and Local 3707*

Sarah Suszczyk* (M.D. Bar No.
0512150240)

NATIONAL ASSOCIATION OF
GOVERNMENT EMPLOYEES, SEIU
LOCAL 5000

NAGE/IBPO/IAEP/IBCO

159 Burgin Parkway

Quincy, MA 01269

Telephone: (202) 639-6426

Facsimile: (617) 376-0285

Ssuszczyk@nage.org

*Counsel for Plaintiff National
Association of Government Employees,
SEIU Local 5000*

**pro hac vice admission granted Feb. 7,
2025*

Certificate of Service

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: February 10, 2025

/s/ Elena Goldstein

Elena Goldstein