

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

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL
EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

SOCIAL SECURITY
ADMINISTRATION, *et al.*,

Defendants.

Case No. 1:25-cv-00596-ELH

MOTION TO PROTECT EMPLOYEE IDENTITIES DURING PI HEARING

Defendants respectfully move for entry of an order requiring the parties, during the April 15, 2025 preliminary injunction hearing, to refer to nine of the eleven members of the SSA DOGE Team by their respective monikers (“Employee 1,” “Employee 2,” “Employee 3,” etc.), in place of their actual names.¹ Counsel for Defendants asked whether those employees have a view on whether their identities should be disclosed publicly, and the employees request that their names continue to be withheld.

Defendants have provided Plaintiffs and the Court with information to match each moniker to the name of each individual working on the SSA DOGE Team. Because other agency DOGE Teams’ members have been subject to harassment, and because the use of a moniker in lieu of a name is not burdensome, there is good cause to continue to protect the identities of SSA’s

¹ Defendants do not object to the public identification of Antonio Gracias and Aram Moghaddassi, whom Defendants have identified as Employee 4 and Employee 7, respectively.

DOGE Team at the upcoming hearing. Therefore, Plaintiffs are not prejudiced by referring to monikers during the hearing.

Defendants conferred with counsel for Plaintiffs, and Plaintiffs take no position on this motion.

Dated: April 14, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on April 14, 2025, I electronically filed the foregoing, which will send a copy to Plaintiffs' counsel of record.

/s/ Samuel S. Holt
SAMUEL S. HOLT