

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN PUBLIC HEALTH
ASSOCIATION, et al.,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH, et
al.,

Defendants.

Case No. 1:25-cv-10787-BEM

PLAINTIFFS' UNOPPOSED MOTION TO FILE UNDER SEAL
CERTAIN DECLARATIONS AND EXHIBITS

Pursuant to Local Rule 7.2, Plaintiffs respectfully request leave to file certain non-plaintiff organizational member declarations and exhibits to Plaintiffs' Motion for Preliminary Injunction under seal. Due to the organizational nature of Plaintiffs UAW and APHA, certain non-plaintiff organizational members ("Organizational Declarants") will file declarations in support of Plaintiffs' forthcoming Motion for Preliminary Injunction. A subset of these non-plaintiff organizational members have privacy interests that necessitate the protection of their individual identities ("Certain Organizational Declarants") and seek for their declarations, and supporting exhibits, to be filed under seal.¹

¹ These Certain Organizational Declarants include: APHA Member 1; APHA Member 2; APHA Member 7; UAW Member 3; UAW Member 9; UAW Member 10; UAW Member 13; UAW Pre-Member 1; UAW Pre-Member 7. Additionally Plaintiffs request to file under seal certain exhibits attached to the declaration for APHA.

The accompanying Memorandum sets forth the reasons for sealing the organizational member declarations and exhibits. Counsel for Defendants has indicated that they do not object to the motion.

Dated: April 23, 2025

Respectfully submitted,

/s/ Suzanne Schlossberg

Jessie J. Rossman (BBO # 670685)

Suzanne Schlossberg (BBO #703914)

American Civil Liberties Union

Foundation of Massachusetts, Inc.

One Center Plaza, Suite 850

Boston, MA 02108

Telephone: (617) 482-3170

jrossman@aclum.org

sschlossberg@aclum.org

Olga Akselrod*

Alexis Agathocleous*

Rachel Meeropol*

Alejandro Ortiz*

American Civil Liberties Union Foundation

125 Broad Street, 18th Floor

New York, NY 10004

Telephone: (212) 549-2659

oakselrod@aclu.org

aagathocleous@aclu.org

rmeeropol@aclu.org

ortiza@aclu.org

Shalini Goel Agarwal*

shalini.agarwal@protectdemocracy.org

Protect Democracy Project

2020 Pennsylvania Ave., NW, Ste. 163

Washington, DC 20006

Telephone: (202) 579-4582

shalini.agarwal@protectdemocracy.org

Michel-Ange Desruisseaux*

82 Nassau Street, #601

New York, NY 10038

Michel-

ange.desruisseaux@protectdemocracy.org

Kenneth Parreno**
15 Main Street, Suite 312
Watertown, MA 02472
kenneth.parreno@protectdemocracy.org

Lisa S. Mankofsky*
Oscar Heanue*
Center for Science in the Public Interest
1250 I St., NW, Suite 500
Washington, DC 20005
Telephone: (202) 777-8381
lmankofsky@cspinet.org
oheanue@cspinet.org

Counsel for Plaintiffs

** Admitted pro hac vice*

*** Application for admission forthcoming*

LOCAL RULE 7.1 CERTIFICATION

Counsel for Plaintiffs hereby certifies that they conferred with counsel for the Defendants regarding this motion in a good faith effort to narrow or resolve the relief requested. The Defendants indicated they do not object to this motion.

April 23, 2025

/s/ Suzanne Schlossberg
Suzanne Schlossberg

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025 a true copy of the above document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

April 23, 2025

/s/ Suzanne Schlossberg
Suzanne Schlossberg