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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

Plaintiffs,

v.

UNITED STATES OFFICE OF
MANAGEMENT AND BUDGET, et al.,

Defendants.

Case No. 3:25-cv-08302-SI

Emergency Relief Requested

**PLAINTIFFS' SUPPLEMENTAL MOTION
FOR IMMEDIATE TEMPORARY
RESTRAINING ORDER; NOTICE OF
ADDITIONAL EVIDENCE**

At 9:27 am today, October 10, 2025, OMB Director Russell Vought posted on social media: **“The RIFs have begun.”** This corroborates credible information Plaintiffs began receiving earlier this morning from multiple sources that OMB has directed federal agencies government-wide to begin issuing RIF notices today. *See* Huddleston Declaration, filed herewith.

For all the reasons explained in Plaintiffs’ Motion for Temporary Restraining Order (ECF 17), these RIFS violate the Antideficiency Act and the Administrative Procedure Act, including by requiring agency employees to unlawfully work during the shutdown, unlawfully laying off employees during the shutdown, and improperly using the shutdown as the basis for the layoffs. Plaintiffs therefore request an immediate TRO halting OMB from ordering agencies to implement RIFs, and halting the issuance of any RIF notices by any Defendant pending the Court’s already-scheduled October 16, 2025 hearing on Plaintiffs’ motion.

Plaintiffs are available at any time for an earlier hearing. Plaintiffs provided notice to counsel for Defendants this morning of these developments and requested confirmation that RIFs are not being issued today. At 9:56 am, counsel for Defendants confirmed: “Our understanding is that RIFs are taking place at certain agencies, and we are gathering the details to put in today’s filing as the court ordered.”

Respectfully submitted,

DATED: October 10, 2025

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28

Case No. 3:25-cv-08302-SI

**SUPPLEMENTAL DECLARATION OF
THOMAS ANDREW HUDDLESTON IN
SUPPORT OF PLAINTIFFS'
SUPPLEMENTAL MOTION FOR
IMMEDIATE TEMPORARY
RESTRAINING ORDER**

DECLARATION OF THOMAS ANDREW HUDDLESTON

I, Thomas Andrew Huddleston, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the Director of Advocacy for the American Federation of Government Employees, AFL-CIO (“AFGE”), a labor organization and unincorporated association that represents approximately 800,000 federal civilian employees through its affiliated councils and locals in every state in the United States. I have been the Director of Advocacy since August 2025. Between 2019 and August 2025, I served as the Director of Communications for AFGE.

3. In my roles as Director of Advocacy and Director of Communications, I am responsible for overseeing and directing AFGE’s press and public relations strategy. In this role, I review and collect information regarding actions by the President and federal agencies and press reporting that may impact AFGE and its members.

4. On October 10, 2025, at 9:27am, United States Office of Management and Budget (“OMB”) Director Russell Vought posted the following message on the social media platform X.com: “The RIFs have begun.” A true and correct copy of Vought’s post, downloaded from the link <https://x.com/russvought/status/1976686105199268177>, is attached hereto as **Exhibit A**.

5. On October 10, 2025, Bloomberg Law published an article titled “White House Says Federal Worker Layoffs Begin Amid Shutdown.” A true and correct copy of the article, downloaded from the link <https://news.bloomberglaw.com/daily-labor-report/white-houses-vought-says-federal-worker-layoffs-have-begun>, is attached hereto as **Exhibit B**. The article reports that “[t]he White House says it is making good on threats to fire thousands of federal workers amid a government shutdown now in its 10th day” and that “[t]housands of people will be laid off as a result of the shutdown, according to a senior White House official.”

6. On October 10, 2025, Government Executive published an article titled “‘Substantial’ layoffs begin at federal agencies, White House says.” A true and correct copy of the article, downloaded from the link <https://www.govexec.com/workforce/2025/10/substantial-layoffs-begin-federal-agencies-white-house-says/408752/?oref=ge-featured-river-top>, is attached hereto as **Exhibit**


1 C. The article reports that “[a]n OMB spokesperson confirmed the layoff notices were going off and
2 would be ‘substantial.’”

3 7. OMB Director Vought’s positing confirms information I heard from a credible source
4 this morning that OMB directed agencies governmentwide to begin issuing RIF notices to federal
5 employees today.

6 8. I have also heard from credible sources that John York, the Assistant Secretary for
7 Management at the Department of the Treasury, has been directed by the Trump Administration to
8 issue RIF notices today, and has staff working to issue 1,300 RIF notices across the Treasury
9 Department today. I have been informed that there are human resources staff, including human
10 resources staff from the Internal Revenue Service who have been detailed to the broader Treasury
11 Department, who are currently working on those RIF notices.

12 I declare under penalty of perjury under the laws of the United States that the foregoing is true
13 and correct. Executed October 10, 2025, in Washington, D.C.

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Thomas Andrew Huddleston

Exhibit A



←

Post

Russ Vought

@russvought

The RIFs have begun.

9:27 AM · Oct 10, 2025 · 192.5K Views

389

762

2.3K

75

Read 389 replies

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https://x.com/russvought/status/1976686105199268177

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Exhibit B

Daily Labor Report

White House Says Federal Worker Layoffs Begin Amid Shutdown (2)

Oct. 10, 2025, 9:53 AM PDT

The White House says it is making good on threats to fire thousands of federal workers amid a government shutdown now in its 10th day.

"The RIFs have begun," White House Budget Director Russell Vought posted on social media Friday, referring to reductions in force, the federal government's term for layoffs.

Thousands of people will be laid off as a result of the shutdown, according to a senior White House official. The scope of the cuts was not immediately clear.

Department of Health and Human Services employees were among those affected, according to HHS spokesperson Andrew Nixon.



Russell Vought

Photographer: Jim Lo Scalzo/EPA/Bloomberg

The firings mark the first large-scale layoffs of federal employees during a funding lapse in modern history, going beyond the furloughs that have characterized past temporary shutdowns. The move ups the stakes in a multi-week standoff with Democrats over federal funding and health care subsidies.

"We believe that they are not only unethical and immoral but illegal for him to be RIFing people in a shutdown," Representative Sarah Elfreth, a Maryland Democrat, said Friday at the US Capitol.

More than two-thirds of civilian federal employees have remained on the job this shutdown — either as essential workers or in roles that receive longer-term funding — with the rest being sent home. The vast majority of federal employees go without pay.

The latest move is reminiscent of Elon Musk's efforts through the Department of Government Efficiency earlier this year to slash the federal workforce. The Tesla Inc. chief executive officer gutted the federal workforce through voluntary resignations, retirements, and targeted firings of probationary employees.

About 150,000 of the voluntary departures took effect with the start of the new fiscal year on Oct. 1, but some other staffing reductions have been tied up by court challenges.

Friday's job eliminations mark the latest effort by Trump to make the shutdown as painful as possible for Democratic constituencies while deeming his own priorities as essential services.

Hours into the shutdown earlier this month, the Trump administration paused \$18 billion in infrastructure spending in New York City, \$2 billion for Chicago transit and \$8 billion for green energy projects in 16 states — all of which voted for Democrat Kamala Harris in last year's presidential election.

The White House has previously admitted that the DOGE job cuts presented political risks. Trump has mused that Musk's efforts weren't politically popular and Commerce Secretary Howard Lutnick said DOGE got its attempt to cut federal spending "backward" by leading with mass terminations, rather than looking to create efficiencies.

But the tactic gives Trump a chance to talk tough to his MAGA base. He has often derided the federal workforce as being stacked with bureaucrats who he says oppose his agenda. But it also leaves less room for Republicans to blame the most enduring consequences of a shutdown on Democrats.

On Capitol Hill, bipartisan talks have continued in fits and starts, with a handful of Democrats crossing party lines to support short-term spending bills. But party leaders remain divided over whether to tie an extension of Affordable Care Act subsidies to reopening the government.

(Updates with details on cuts from first paragraph)

--With assistance from Erik Wasson.

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Exhibit C

Government Executive

‘Substantial’ layoffs begin at federal agencies, White House says

By Eric Katz

12:52 PM ET

The Trump administration began issuing significant layoffs on Friday, the White House budget director said, following through on a threat to inflict pain on the federal workforce as a consequence of the government shutdown.

“The RIFs have begun,” Office of Management and Budget Director Russ Vought said in a post on X Friday afternoon, referring to “reductions in force.”

An OMB spokesperson confirmed the layoff notices were going off and would be “substantial.”

The White House has said the shutdown, which entered its 10th on Friday, an “unenviable choice” of determining where permanent layoffs should occur, though President Trump has also called the situation an “opportunity.”

No previous shutdown has triggered such action. Typically, as in the current lapse, shutdowns lead to large numbers of employees being sent home on furlough, who are then recalled when the government reopens. Under a provision Trump signed into law in his first term, those employees are now guaranteed back pay—though the administration has also threatened to circumvent that statute.

The White House has repeatedly said the layoffs would [take place imminently](#). The American Federation of Government Employees has sued over the RIF threat and a federal judge in California is set to hold a hearing on the case Friday afternoon.

Any RIF notices issued in the coming days will likely come with a 60-day notice period before employees are actually terminated. While administration officials have suggested the layoffs represent a permanent action, OMB has advised agencies they may revise their layoff plans once the government is reopened.

This is a breaking news story that will be updated.

[[Related Posts]]

By Eric Katz

12:52 PM ET

<https://www.govexec.com/workforce/2025/10/substantial-layoffs-begin-federal-agencies-white-house-says/408752/>