

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

U.S. CONFERENCE OF CATHOLIC
BISHOPS,

Plaintiff,

v.

DEPARTMENT OF STATE, et al.

Defendants.

Civil Action No. 25-0465 (TNM)

NOTICE OF CHANGE OF MATERIAL FACTS

Defendants, by and through the undersigned counsel, respectfully file this notice of change of material facts.

On February 26, 2025, the State Department notified Plaintiff that its cooperative agreements were “immediately terminated as of February 27, 2025, because the ‘award no longer effectuates agency priorities.’” Letters of Feb. 26, 2025 (attached hereto as Ex. A). The State Department’s termination of the agreements underlying this dispute now plainly put this matter into the realm of a contract dispute seeking more than \$10,000, which falls within the exclusive jurisdiction of the Court of Federal Claims under the Tucker Act.

That is, the termination of the agreements leaves open only a question of unpaid money under the cooperative agreements, and, to the extent Plaintiff disputes any reimbursement, the dispute needs to be brought in the Court of Federal Claims. Even could the Court have entertained injunctive relief under the Administrative Procedure Act to compel the State Department to take some action under the agreements during their lifetimes, any such jurisdiction is now clearly absent as there is no action the Court could compel—the parties’ agreements are no longer in force. Relatedly, Plaintiff can claim no irreparable harm absent an injunction as the only relief now

available to Plaintiff is money damages should the parties be unable to resolve any payment disputes through any available administrative channels.

Dated: February 27, 2025
Washington, DC

Respectfully submitted,

EDWARD R. MARTIN, JR., D.C. Bar #481866
United States Attorney

BRIAN P. HUDAK
Chief, Civil Division

By: /s/ Joseph F. Carilli, Jr.
JOSEPH F. CARILLI, JR.
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
(202) 252-2525

Attorneys for the United States of America

Exhibit A



Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

United States Conference of Catholic Bishops
3211 Fourth St NE
Washington, DC 20017-1104

REF: SPRMCO24CA0336; FY25 Enduring Welcome Reception and Placement

Dear Anthony Granado:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 27, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. Payment requests for legitimate costs incurred prior to this notification are allowable. If your award is already in suspended status, payment requests for legitimate costs incurred prior to the effective date of the Notice of Suspension are allowable. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

Joseph Kouba
Comptroller

JOSEPH
G KOUBA

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by JOSEPH G
KOUBA
Date: 2025.02.26
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Department of State

Termination Notification

NOTICE OF TERMINATION

February 26, 2025

United States Conference of Catholic Bishops
3211 Fourth St NE
Washington, DC 20017-1104

REF: SPRMCO24CA0342; FY24 MRA Reception and Placement

Dear Anthony Granado:

The U.S. Department of State hereby notifies the recipient that this award is immediately terminated as of February 27, 2025. This award no longer effectuates agency priorities and is terminated in accordance with the U.S. Department of State Standard Terms and Conditions, 2 CFR 200.340, and/or Award Provisions as applicable.

Effective immediately upon receipt of this Notice of Termination, the Recipient must stop all work on the program and not incur any new costs after the effective date cited above. The Recipient must cancel as many outstanding obligations as possible.

Final reports will be due in accordance with the Award Provisions.

Sincerely,

Joseph Kouba
Comptroller

JOSEPH
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KOUBA

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