



**FEMA**

**Grant Programs Directorate Information Bulletin**  
**No. 546**  
**December 1, 2025**

MEMORANDUM FOR: Plaintiffs in *County of Santa Clara v. Noem*, No. 25-cv-8330 (N.D. Cal.).

FROM: David R. Arnold  
Senior Official Performing the Duties of Deputy Administrator for Resilience

SUBJECT: **Notice of November 21, 2025 Preliminary Injunction in *County of Santa Clara v. Noem***

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## **I. Purpose**

The purpose of this Information Bulletin (IB) is to provide guidance regarding the preliminary injunction entered on November 21, 2025 by the District Court of the Northern District of California in *County of Santa Clara v. Noem*, No. 25-cv-8330 (N.D. Cal.).

## **II. Applicability**

This IB is applicable to all grant awards or subawards to the following plaintiffs in the above mentioned case: the County of Santa Clara, City and County of San Francisco, City of Alameda, City of Bellingham, City of Berkeley, City of Culver City, City of Los Angeles, County of Los Angeles, Los Angeles County Consolidated Fire Protection District, Martin Luther King, Jr. County, County of Marin, City of Oakland, City of Palo Alto, City of Pasadena, City of Petaluma, Pierce County, City of Sacramento, City of San Diego, County of San Diego, City of San José, County of San Mateo, City of Santa Monica, City of Santa Rosa, Snohomish County, County of Sonoma, Sonoma County Community Development Commission, Sonoma County Water Agency, Sonoma Valley County Sanitation District, and the City of Tucson.

## **III. Guidance**

On November 21, 2025, the Court entered a preliminary injunction. Pursuant to the preliminary injunction, DHS:

- “[IS] RESTRAINED AND ENJOINED from directly or indirectly taking any action to withhold, freeze, or condition funds from the plaintiffs based on (1) Section C.XVII of the Standard DHS Terms (the “Discrimination Condition”); and (2) Section C.XXXI of the Standard DHS Terms (the “EO Condition”)”

The Federal Emergency Management Agency is required to comply with this order.<sup>1</sup> As such, no actions will be taken to withhold, freeze, or condition funds for any of the above named plaintiffs based on (1) Section C.XVII of the Fiscal Year 2025 Standard DHS Terms and (2) Section C.XXXI of the Fiscal Year 2025 Standard DHS Terms.

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<sup>1</sup> Nothing in this Information Bulletin should be construed as a waiver by FEMA or the Department of Homeland Security of their right to appeal or pursue any other legal remedy available to them.