IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

THE RELIGIOUS SISTERS OF MERCY, *et al.*, *Plaintiffs,* v. ALEX M. AZAR, Secretary of the United States Department of Health and Human Service, *et al.*, *Defendants.*	No. 3:16-cv-386
THE CATHOLIC BENEFITS ASSOCIATION; DIOCESE OF FARGO; CATHOLIC CHARITIES NORTH DAKOTA; and CATHOLIC MEDICAL ASSOCIATION, *Plaintiffs,* v. ALEX M AZAR, Secretary of the United States Department of Health and Human Service, *et al.*, *Defendants.*	No. 3:16-cv-432

CBA PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS, AND IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT AND FOR PERMANENT INJUNCTIVE AND DECLARATORY RELIEF

The government effectively concedes the merits of Plaintiffs' RFRA claims as well as their entitlement to declaratory and injunctive relief. Its sole contention is that this case is not justiciable by virtue of the 2020 Rule. But that contention is predicated on two fundamental errors: first that the 2020 Rule is operative (it is not), and second that it would have relieved the burden on CBA

members' religious exercise (it would not have). CBA members *already* have been injured as a result of Defendants' rulemaking, a fact the government simply ignores. And its brief is essentially silent about the position of the EEOC, which committed in 2016 to help enforce the Mandate's requirements and, since then, has only solidified that commitment through its enforcement efforts. This case is justiciable. Under the present regulatory landscape, CBA members continue to be burdened in their religious exercise and are entitled to declaratory and injunctive relief so they can carry on their ministries and other activities free of this unlawful Mandate.[1]

I. The Mandate has concretely harmed CBA members already.

Plaintiffs define the Mandate as the series of rules and policies by which Defendants have interpreted federal law – Section 1557, Title IX, and Title VII – to require CBA members to perform and cover gender-transition and abortion services in violation of their sincerely held religious beliefs. RFRA protects CBA members' refusal to perform and cover these services, and Plaintiffs ask the Court to declare Defendants' interpretation unlawful and permanently enjoin them from enforcing any such interpretation against present and future members of the CBA. *See* ECF No. 98 (motion setting forth in detail Plaintiffs' request for relief).

The harm to CBA members because of the Mandate is anything but hypothetical. As a result of the 2016 Rule, two CBA members already have been required to cover gender-transition services for their employees, even though this coverage conflicts with these members' – and indeed all CBA members' – religious beliefs. Mem. in Supp. of CBA Pls.' Mot., ECF No. 104, at 10

[1] The Court's local rules permit 40 pages for a response brief and 10 pages for a reply. D.N.D. L. Civ. R. 7.1(A)(1). Because this brief represents a combined response in opposition to the government's motion to dismiss (ECF No. 112) and a reply in support of Plaintiffs' motion for partial summary judgment (ECF No. 98), Plaintiffs have gone a bit over the 10-page reply brief limit.

(hereafter "CBA Mem.") The government does not dispute that these injuries arise as a result of the 2016 Rule. Indeed, they are a concrete manifestation of the burden that its rule has imposed.

Although a permanent injunction for these members will not itself remove the objectionable coverage, it is a necessary prerequisite. To establish standing, a plaintiff "need not show that a favorable decision will relieve his *every* injury," as long as it would redress a "discrete portion" of the injury. *281 Care Comm. v. Arneson*, 638 F.3d 621, 631 (8th Cir. 2011) (quoting *Minn. Citizens Concerned for Life v. FEC*, 113 F.3d 129, 131 (8th Cir. 1997)) (internal quotation marks omitted). Even an incremental step that increases the likelihood that an injury will be redressed is sufficient for standing. *See Massachusetts v. EPA*, 549 U.S. 497, 525-26 (2007). The question is whether "the risk of harm would be reduced *to some extent* if [Plaintiffs] received the relief they seek." *Id.* at 526 (quotation omitted). That standard is met here. A declaration that CBA members are free to contract for morally compliant health coverage, and a permanent injunction restraining HHS and the EEOC from enforcing a coverage mandate against CBA members and their insurers, *see* ECF No. 98, ¶ 4, would clear the way for members to request removal of this coverage from their health plans. "Even if [CBA] members would not be out of the woods, a favorable decision would relieve their problem 'to some extent,' which is all the law requires." *Consumer Data Indus. Ass'n v. King*, 678 F.3d 898, 903 (10th Cir. 2012) (quoting *Massachusetts v. EPA*, 549 U.S. at 526).

Actual injury to CBA members is further evident in demands by third party administrators (TPAs) for indemnification. For example, Diocese of Fargo, a named plaintiff here, has been forced to indemnify its TPA against liability for exclusion of abortion and gender-transition services from its health plan. CBA Mem. at 10. Again, the government does not dispute that this injury arises as a result of its rule. It is unquestionably sufficient for standing. *See Jones v. Gale*,

470 F.3d 1261, 1267 (8th Cir. 2006) ("[P]laintiffs have standing to challenge the constitutionality of a law that has a direct negative effect on their borrowing power, financial strength, and fiscal planning." (quotation omitted)).

II. The EEOC's interpretation of Title VII continues to burden religious exercise and necessitates injunctive relief.

When the 2016 Rule was promulgated, HHS noted that the EEOC both shared its interpretation of the phrase "on the basis of sex," *see* 81 Fed. Reg. 31,375, 31,390 (May 18, 2016), and would cooperate to enforce the Mandate pursuant to Title VII, *see id.* at 31,432. The 2016 Rule thus reflects the completion of a decisionmaking process by both agencies and the EEOC's express commitment to implement the Mandate under its own statutory authority. The EEOC has never suggested that the 2016 Rule represents anything other than its definitive position on this issue. *See Sisseton-Wahpeton Oyate of Lake Traverse Reservation v. U.S. Corps of Eng'rs*, 888 F.3d 906, 915 (8th Cir. 2018) (agency action is final under the APA when it marks "the consummation of the agency's decisionmaking process" and the agency "has issued a definitive statement of its position" (quotations omitted)).

CBA members' need for relief against the EEOC is made more acute because the EEOC has never backed off its view. In the 2016 Rule, both agencies said they interpreted the phrase "on the basis of sex" to require religious employers like CBA members to cover gender-transition procedures in their health plans. Then, in the 2020 Rule, while HHS at least tried to repeal this definition to some extent, the EEOC did not. Nowhere in the 2020 Rule did the EEOC suggest that it had changed course, nor did it publish rules or other guidance to that effect. Indeed, the only actions the EEOC has taken point in the opposite direction: since its 2016 pronouncement to cooperate with HHS, the EEOC has conducted numerous enforcement actions to require employer coverage of gender-transition procedures. *See* CBA Mem. at 9-10.

It is true, as the government points out, that none of these enforcement actions were against CBA members directly. But that does not defeat Plaintiffs' standing for three reasons. First, standing exists when a plaintiff "inten[ds] to engage in a course of conduct arguably affected with a constitutional interest which is clearly proscribed by statute, . . . *even absent a specific threat of enforcement*." *United Food & Commercial Workers Int'l Union v. IBP, Inc.*, 857 F.2d 422, 428 (8th Cir. 1988) (emphasis added). Even the "prospect" of administrative enforcement under a rule that "affirmatively prohibits" the plaintiff's conduct "is justiciable." *Babbitt v. United Farm Workers Nat'l Union*, 442 U.S. 289, 302 n.13 (1979). Here, CBA members do not merely "inten[d]" to follow their consciences. They actually do so when they refuse to cover gender transitions in their health plans, conduct that is clearly proscribed by the EEOC's interpretation of Title VII. And EEOC enforcement actions against similar employers show that this interpretation is more than just lip service. *See 281 Care Comm.*, 638 F.3d at 630 (only a "[t]otal lack of enforcement . . . approaching desuetude" is sufficient to undercut standing in a First Amendment pre-enforcement challenge). Under the circumstances, it is not "wholly speculative" for CBA members to fear that one of them will be the next enforcement target. *Id.*

The reasonableness of this fear is underscored by the fact that two CBA members, both Catholic dioceses, have already been forced by their insurers to provide health coverage for gender transitions. To effectively remove this coverage, these members need declaratory and injunctive relief against *both* HHS *and* the EEOC: against *HHS* because the insurers are "covered entities" and need assurance that HHS will not penalize them for removing the coverage; and against *the EEOC* because the dioceses are Title VII employers and need assurance that the EEOC will not take similar enforcement actions against them. Defendants deliberately designed the Mandate this way – imposing obligations both on the insurers and TPAs that provide and administer health

coverage, and on employers that make coverage available to employees through their health plans. *See* 81 Fed. Reg. at 31,432 (where HHS "lacks jurisdiction over an employer responsible for benefit design [that excludes gender-transition coverage]," it would "refer or transfer the matter to the EEOC and allow that agency to address the matter"). Only by addressing *both* sources of the burden on CBA members, a burden imposed by *both* of the agency Defendants here, can this Court grant the "complete relief" necessary to remedy the RFRA violation. *Porter v. Warner Holding Co.*, 328 U.S. 395, 399 (1946); *FTC v. Sec. Rare Coin & Bullion Corp.*, 931 F.2d 1312, 1315 (8th Cir. 1991) (noting the "historic power of equity to provide complete relief in light of the statutory purposes").

Finally, Plaintiffs' RFRA claims "requir[e] no further factual development" and are purely legal questions. *281 Care Comm.*, 638 F.3d at 631. The government agrees. *See* Combined Mem. in Supp. of Defs. Mot. to Dismiss, ECF No. 113, at 2 n.1 (hereafter "Defs. Mem."). The claims against the EEOC are therefore ripe for review.

III. The government's other justiciability arguments fail.

The government contends that Plaintiffs "lack standing" because the 2016 Rule has been "superseded by the 2020 Rule." Defs. Mem. at 11. But it has not, and a plain reading of the injunctions in *Walker* and *Whitman-Walker Clinic* makes that clear. Regardless, the government is wrong about the effect of its 2020 Rule. Even if the rule were operative, it would not relieve the burden on CBA members' religious exercise.

A. With the 2016 Rule reinstated, CBA members need judicial relief.

The overlapping injunctions in *Walker* and *Whitman-Walker Clinic* resurrect the Mandate and prohibit the government from implementing its new rule. In *Walker*, the district court "stay[ed] the repeal of the 2016 definition of discrimination on the basis of sex"; ordered that the 2016 Rule's "definitions of 'on the basis of sex,' 'gender identity,' and 'sex stereotyping' . . . will remain in

effect"; and enjoined HHS "from enforcing the repeal." 2020 WL 4749859, at *1, *10 (E.D.N.Y. 2020). In *Whitman-Walker Clinic, Inc.*, the district court enjoined the 2020 Rule to the extent it "eliminated 'sex stereotyping' from the [2016] Rule's definition of 'discrimination on the basis of sex'" and barred HHS "from enforcing its incorporation of [a] religious exemption" into the new rule. 2020 WL 5232076, at *1, *45 (D.D.C. 2020). In short, every part of the 2020 Rule that could have relieved the burden on CBA members' religious exercise has been enjoined, and every part of the 2016 Rule that created this burden – particularly the rule's definition of "on the basis of sex" – has been revived and reimposed.

To maintain its justiciability arguments, the government must ignore critical features of these injunctions. For example, the government wrongly suggests that *Walker* merely revived the "sex stereotyping" "portion" of the 2016 Rule. Defs. Mem. at 7. While the court's *standing analysis* certainly focused on sex stereotyping and found that plaintiffs had standing because "*Franciscan Alliance* did not address the concept of 'sex stereotyping,'" 2020 WL 4749859, at *7, the court's actual injunction is much broader:

> Accordingly, *the Court stays the repeal of the 2016 definition of discrimination on the basis of sex*. As a result, the definitions of "on the basis of sex," "gender identity," and "sex stereotyping" currently set forth in 45 C.F.R. § 92.4 will remain in effect. In addition, the Court preliminarily enjoins the defendants from enforcing the repeal. Both the stay and the injunction shall remain in effect pending further order of this Court.

Id. at *10 (emphasis added). Every aspect of the Mandate that HHS and the EEOC imposed through the old rule hinges on their "2016 definition of discrimination on the basis of sex," a definition that encompasses both the gender-transition and abortion provisions of the Mandate. By "stay[ing] the repeal" of this definition and ordering this definition to "remain in effect," the *Walker* court has revived Defendants' interpretations as they existed in 2016. It has purported, in effect, to restore the "status quo ante *ante*" – the state of the law prior to the 2020 Rule and prior even to the *Franciscan Alliance* vacatur.

The *Whitman-Walker Clinic* injunction goes further. The court not only enjoined the repeal of the old rule's "sex stereotyping" provisions – a concept that "cannot be meaningfully separated" from gender identity. 2020 WL 5232076, at *23. It also enjoined HHS from including a religious exemption in the rule. *Id.* at *45. The court invalidated the exemption based on *HHS's own statements* in 2016 that a "blanket religious exemption" could "discourag[e] individuals from seeking necessary care" and result in "the denial of health services to women." *See id.* at *28 (quoting the 2016 Rule) (internal quotation marks omitted). As a result, CBA members cannot take advantage of any regulatory religious exemption, and absent relief from this Court, they remain burdened by a Mandate that is not just "fairly traceable" to Defendants, but in fact directly attributable to their 2016 rulemaking.

The government tries to downplay the invalidation of the religious exemption, arguing that Plaintiffs lack standing because the government has "*expressed its intent* for the exemption to apply." Defs. Mem. at 15 (emphasis added). But an agency's "intent," without more, is not the law. "[I]t is ultimately the provisions of our laws rather than the principal concerns of our legislators by which we are governed." *FDA v. Brown & Williamson Tobacco Corp.*, 529 U.S. 120, 147 (2000) (quotation omitted). Because the relevant provisions of the 2020 Rule never became law, they cannot redress Plaintiffs' injuries.

Importantly, however, the two injunctions leave ample room for the relief Plaintiffs request in their motion. Plaintiffs here, on behalf of all CBA members, seek a *RFRA-based exemption* to any requirement derived from Section 1557, Title IX, or Title VII that they provide or cover gender-transition or abortion procedures. The *Walker* court did not foreclose the possibility of such an exemption. And the *Whitman-Walker Clinic* court, in invalidating a "blanket" religious exemption, nonetheless recognized the availability of individualized exemptions based on RFRA.

See 2020 WL 5232076, at *29 (stating that "nothing in this decision renders religiously affiliated providers devoid of protection" and "[n]othing in the Court's decision today implicates in any fashion the applicability of" RFRA). Neither decision, then, precludes this Court from awarding declaratory and injunctive relief on Plaintiffs' RFRA claims, and doing so would not interfere with another district court's remedial authority. *See Christian Employers Alliance v. Azar*, 2019 WL 2130142 (D.N.D. 2019) (awarding declaratory and injunctive relief under RFRA despite existence of two injunctions against new HHS rule that might have eliminated the religious burden had it been allowed to go into effect).[2]

The government's appeals of the *Walker* and *Whitman-Walker Clinic* injunctions do not moot Plaintiffs' claims. The speculative possibility that the government *might* succeed in overturning the injunctions against the 2020 Rule does not alleviate the present, concrete burden on Plaintiffs' religious exercise as a result of the Mandate. Essentially, the government wants the Court to opine on the justiciability of this case based on a "hypothetical state of facts," *MedImmune, Inc. v. Genentech, Inc.*, 549 U.S. 118, 127 (2007), namely, the future outcome of those appeals. But this Court should not dismiss a live controversy, especially one pending for over four years, based on the mere prospect that a future decision in a different case *might* have some effect on this one. *See North Dakota v. Heydinger*, 825 F.3d 912, 918 (8th Cir. 2016) (district court has a "virtually unflagging obligation" to exercise federal jurisdiction (quotation omitted)); *Hunt v. Imperial Merch. Servs., Inc.*, 560 F.3d 1137, 1141 (9th Cir. 2009) (refusing to dismiss live controversy simply because separate appellate proceedings "might" moot the case). Similarly

[2] The government alludes to the policy against duplicative federal litigation. *See* Defs. Mem. at 13. But that policy, which is designed to preclude plaintiffs from pursuing "multiple federal suits against the same party involving the same controversy at the same time," *Missouri ex rel. Nixon v. Prudential Health Care Plan, Inc.*, 259 F.3d 949, 954 (8th Cir. 2001), is not implicated here.

unavailing is the government's suggestion that Plaintiffs could participate as *amici* in those appeals. Neither the Second Circuit in *Walker* nor the D.C. Circuit in *Whitman-Walker Clinic* is empowered to grant relief on Plaintiffs' claims. Only this Court can do so.

B. The 2020 Rule does not redress Plaintiffs' injuries.

Even if the government were right about the current regulatory landscape, this case still would be justiciable. That is because the 2020 Rule, even if it were operative, would still arguably impose the same burden on religious exercise as the 2016 Rule.

The government emphasizes that its new rule "does not define 'on the basis of sex'" and simply "let[s] the underlying statutes speak for themselves." Defs. Mem. at 22. Numerous courts have interpreted the phrase "on the basis of sex" – in Section 1557, Title IX, Title VII, and elsewhere – to encompass gender identity. *E.g.*, *Bostock v. Clayton County*, 140 S. Ct. 1731, 1753 (2020); *Tovar v. Essentia Health*, 342 F. Supp. 3d 947, 953 (D. Minn. 2018) ("Because Title VII, and by extension Title IX, recognize that sex discrimination encompasses gender-identity discrimination, the Court concludes that Section 1557 also prohibits discrimination on the basis of gender identity."). The EEOC has done the same both in the 2016 Rule itself and through its enforcement actions against Title VII employers. CBA Mem. at 8-9. And HHS itself says the 2020 Rule "would not preclude application of [such a] construction." 85 Fed. Reg. at 37,168. If these judicial and administrative interpretations "speak for" the statutes, then the 2020 Rule does not "remove" the religious burden at all. *Cf.* Defs. Mem. at 7. Rather, it widens it. The rule expressly permits HHS, the EEOC, and others to continue doing what they have already done: interpret Section 1557, Title IX, Title VII, and other laws to impose precisely the burden on religious exercise that Plaintiffs are challenging here.

As the Eighth Circuit has held, "[s]tanding analysis under the First Amendment is intended to allow challenges based on this type of injury," *281 Care Comm.*, 638 F.3d at 630-31 – logic that

applies *a fortiori* to RFRA, which was enacted to provide even "greater protection . . . than is available under the First Amendment," *Holt v. Hobbs*, 574 U.S. 352, 357 (2015). To establish standing, Plaintiffs need only allege they wish to engage in activity that the 2020 Rule "arguably covers." *Id.* at 630 (quotation omitted). They have met this standard. The 2020 Rule "arguably," if not actually, requires CBA members to continue providing and covering gender-transition and abortion services, and the EEOC's unchanged interpretation of Title VII imposes a similar requirement. The burden on CBA members' religious exercise is "not based on speculation" about the government's future rulemaking, but on injuries that "ha[ve] already occurred and will continue to occur," *id.* at 631, as a result of the government's interpretation and enforcement of the "underlying statutes," Defs. Mem. at 22. Further, "[w]hen a statute is challenged as unconstitutional, the proper defendants are the officials whose role it is to administer and enforce the statute." *281 Care Comm.*, 638 F.3d at 631. Plaintiffs' RFRA claims against HHS and the EEOC are therefore ripe.

The government cannot have it both ways. It cannot maintain on the one hand that its new rule would have relieved the burden on religious exercise, and then maintain on the other hand that its rule effectively *widens* that burden by allowing federal agencies to continue enforcing the same interpretations of Section 1557, Title IX, and Title VII, now and in the future. "[D]efendants' ripeness challenge fails." *Id.*

IV. The CBA has associational standing to represent its members.

The CBA satisfies the requirements for associational standing, which require it to demonstrate that "[1] its members would otherwise have standing to sue in their own right; [2] the interests it seeks to protect are germane to the organization's purpose; and [3] neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit." *Hunt v. Wash. State Apple Adver. Comm'n*, 432 U.S. 333, 343 (1977). The government does not

contest the second requirement, germaneness. (The CBA's organizational purposes satisfy this requirement in any event. CBA Mem. at 6-7.) The other two requirements are clearly met.

First, the CBA's members, and the named Plaintiffs here, include healthcare providers and employers that are subject to the Mandate's requirements to provide and cover gender-transition and abortion services. This burden arose as a result of Defendants' rulemaking in 2016; is made evident in, among other things, the present effects on CBA members' health plans; and remains in place today. To meet the first prong of associational standing, it is sufficient for an association to show that "*one of its members* has individual standing." *Owner-Operator Indep. Drivers Ass'n v. U.S. Dep't of Transp.*, 878 F.3d 1099, 1101 n.2 (8th Cir. 2018) (emphasis added). That criterion is satisfied here.

Regarding the third prong of the test, the government suggests that it needs the "identities" of CBA members in order to "comply with . . . an injunction." Defs. Mem. at 17 n.4. It does not. First, since 2016, when this Court entered a stay of enforcement, the government has never hinted at any trouble in complying with the Court's order. Second, HHS's own 2020 Rule does not require an organization to affirmatively identify itself to take advantage of the putative religious exemption. As HHS put it in the new rule, "Congress has already created various religious and conscience protections in healthcare by enacting several statutes, including RFRA . . . . This final rule simply states that the Section 1557 regulation will be implemented consistent with those statutes." 85 Fed. Reg. 37,160, 37,207 (June 19, 2020). If HHS did not need the identity of organizations to implement the regulatory exemption in its rule, it does not need the identity of CBA members to comply with a judicial exemption arising out of this case. In any event, given CBA members' reasonable fear of enforcement actions, the government demand for members'

identities is "subject to the closest scrutiny," *NAACP v. Alabama*, 357 U.S. 449, 461 (1958), and it has not carried this burden.

This Court recently entered injunctive relief against a federal healthcare mandate for a membership organization very similar to CBA, extending relief not only to current members of the organization, but also to future members (as well as their insurers and TPAs). *See Christian Employers Alliance*, 2019 WL 2130142, at *5-6. The Court found "little rationale" for limiting the injunction to current members and "agree[d] . . . that such a limitation would result in continuous litigation and be a waste of judicial resources." *Id.* The Court's reasoning applies *a fortiori* here, where the government now suggests the injunction should exclude even *current* association members. Why? There is no rationale for such a limitation, and it would force individual CBA members to file hundreds of individual lawsuits to secure RFRA-based judicial exemptions, even though these members, current and future, hold the same religious objections to the Mandate and are similarly burdened by it. This would be a needless waste of resources for everyone – Plaintiffs, the government, and the courts. *See id.*; *see also Catholic Benefits Ass'n v. Sebelius*, 24 F. Supp. 3d 1094, 1107 n.16 (W.D. Okla. 2014) (court was "satisfied" that CBA's membership criteria "ensured the uniformity of belief" among members to whom injunctive relief extended).[3]

V. CBA members are entitled to declaratory and injunctive relief under RFRA.

The government does not otherwise contest the merits of Plaintiffs' RFRA claims or their entitlement to injunctive relief. Its contentions on this front simply recast its erroneous justiciability arguments. *See* Defs. Mem. at 21, 26. In any event, the government concedes the merits of the RFRA claims. *See id.* at 6 (noting "agree[ment] with the *Franciscan Alliance* ruling"); 85 Fed. Reg. at 37,206 ("[HHS] agrees with the court in *Franciscan Alliance* that particular

[3] Under Plaintiffs' motion, to be entitled to the injunctive relief, future CBA members must join under the same membership criteria as current members. *See* ECF No. 98, ¶ 4(a)(3).

provisions in the 2016 Rule violated RFRA as applied to private plaintiffs."). Plaintiffs are therefore entitled to summary judgment on their RFRA claims and to declaratory and permanent injunctive relief against Defendants.

VI. Conclusion

On behalf of present and future CBA members, Plaintiffs ask the Court to deny the government's motion to dismiss and enter summary judgment on Plaintiffs' RFRA claims as further detailed in their motion (ECF No. 98).

Respectfully submitted January 6, 2021,

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2020, I electronically filed a copy of the foregoing. Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

s/ *Ian Speir*
Ian Speir

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