

IN THE
Supreme Court of the United States

No. 24A1203

LINDA MCMAHON, *et al.*,
Applicants,

v.

STATE OF NEW YORK, *et al.*,
Respondents.

**On Application to Stay the Injunction Issued
by the United States District Court
for the District of Massachusetts
and Request for an Immediate Administrative Stay**

**BRIEF *AMICUS CURIAE* OF
AMERICA'S FUTURE
IN SUPPORT OF APPLICANTS**

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INTEREST OF THE *AMICUS CURIAE*¹

Amicus curiae America's Future is a nonprofit organization, exempt from federal income taxation under section 501(c)(3) of the Internal Revenue Code. It is dedicated, *inter alia*, to the correct construction, interpretation, and application of law. *Amicus* participates actively in the public policy process and has filed numerous *amicus curiae* briefs in federal and state courts.

This *amicus* recently filed an *amicus* brief in support of the Government's application for stay in another case complaining of reductions in force in multiple departments and agencies. See Brief *Amicus Curiae* of America's Future, *et al.*, in *Trump v. American Federation of Government Employees, AFL-CIO*, No. 24A1174 (June 9, 2025).

STATEMENT OF THE CASE

On March 11, 2025, the Department of Education announced a reduction in force ("RIF") affecting 1,378 employees. See Application for Stay ("App.") at 7. In response, the State of New York, 19 other states, and the District of Columbia filed suit against Linda McMahon, Secretary of Education; President Donald Trump; and the U.S. Department of Education ("DOE"). In a consolidated case, two local public school districts and five government employee unions filed suit against the same defendants. See *Somerville Public Schools, et al. v. McMahon*.

¹ It is hereby certified that no counsel for a party authored this brief in whole or in part; and that no person other than these *amici curiae*, their members, or their counsel made a monetary contribution to its preparation or submission.

Petitioners argued below that the Civil Service Reform Act of 1978 (“CSRA”) divested the lower courts of jurisdiction because CSRA requires terminated federal employees to challenge any termination through the Merit Systems Protection Board (“MSPB”), and that any appeals must be routed to the Federal Circuit. *See* App. at 26. They also argued that the CSRA applies to federal employees, and since none of the Respondents were federal employees, they had no legal basis to challenge the EO. *Id.* at 28.

On May 22, 2025, the District Court for the District of Massachusetts granted a preliminary injunction, ordering the immediate reinstatement of all fired employees. *New York v. McMahon*, 2025 U.S. Dist. LEXIS 97722 at *143 (D. Mass. 2025) (“*McMahon I*”). The district court ruled that, even though the Government was correct as to how individual terminations would be handled, the court could take jurisdiction due to the large number of terminations. *Id.* at *74. The district court ruled, instead, that because the CSRA only applies to federal employees, a non-employee plaintiff could have standing outside of the MSPB and Federal Circuit. *Id.* at *75.

The district court ruled that Respondents were likely to succeed on the merits, because Executive Order No. 14,242 would effectively eliminate the DOE without congressional action.² *Id.* at *80-81. The court also ruled that the plaintiffs could pursue an Administrative Procedure Act (“APA”) challenge. *Id.* at *87-88.

² On March 25, 2025, President Trump issued Executive Order No. 14,242 (90 *Fed. Reg.* 13,679) (Mar. 25, 2025) (“the EO”). The EO directs the Secretary to facilitate closure “to the maximum extent appropriate and permitted by law.”

The next day, the court denied Defendants’ motion for a stay pending appeal. *New York v. McMahon*, 2025 U.S. Dist. LEXIS 99238 (“*McMahon II*”). On May 27, the First Circuit denied the government’s emergency motion for an administrative stay. *New York v. McMahon*, 2025 U.S. App. LEXIS 13039 (1st Cir. 2025) (“*McMahon III*”). On June 4, the First Circuit again denied a motion for a stay pending appeal. *Somerville Pub. Sch. v. McMahon*, 2025 U.S. App. LEXIS 13662 (1st Cir. 2025) (“*McMahon IV*”). The First Circuit found that plaintiffs were likely to succeed because the large scope of the EO would “dismantle [DOE] – and effectively close it.” *Id.* at *10.

SUMMARY OF ARGUMENT

The district court described the Department of Education’s Reduction in Force in hyperbolic terms to support its speculation that the RIFs will deal a crippling blow to the ability of the Department to fulfill its statutorily required functions. The functions worried about here involve authorizing payments to be made to the Respondent states and organizations. Such assertions are nothing more than unsupported conjecture. The Government has explained that the RIFs would not impair the Department’s ability to carry out its responsibilities under law. This case is not about the President’s desire to shut down the Department, but the district court conflated that issue with the RIF. *See* Section I, *infra*. The Government made a compelling argument that the district court was without jurisdiction to issue the injunction, and rather than decide the issue, it deferred that threshold issue until after the merits of the case would be resolved. The District of Massachusetts and the First

Circuit join the ranks of a few federal district courts and certain courts of appeals which have been willing to enjoin the policy of the Trump Administration for lengthy periods of time. *See* Section II, *infra*.

Neither the Respondents' APA challenge nor the generalized constitutional claims based on separation of powers and the Take Care Clause demonstrates claims that could entitle Respondents to injunctive relief. *See* Section III, *infra*. Significant RIFs are anticipated by federal law and have occurred without judicial intervention. There is no basis for new law to change the rules because Respondents would prefer to thwart the policies of a President elected by all the People. *See* Section IV, *infra*.

ARGUMENT

I. THE FIRST CIRCUIT DENIED THE GOVERNMENT'S APPLICATION FOR A STAY BASED ON A WHOLESALE ADOPTION OF A FLAWED DISTRICT COURT DECISION.

The First Circuit denial of a stay of the district court injunction apparently was based on a press release indicating that the RIF “impacted approximately half” of the Department of Education’s employees. *McMahon IV* at *4. However, the Government’s Application explains that this number was inflated by including employees “who opted for deferred resignation or voluntary separation,” with respect to whom Respondents did not seek any remedy. App. at 7, n.3. Thus, the RIF that the lower courts should have been addressing involved 1,378 employees, or about a third of its workforce — not half. *See id.* Although this may not seem like a major difference, it was the first of many statements and assumptions made by both the district court and the First Circuit to support injunctive relief. For example, the

district court described this RIF as “**mass terminations.**” *McMahon I* at *37 (emphasis added). The district court simply assumed the RIFs “**will likely cripple the Department....**” App. at 3a (emphasis added). The First Circuit readily approved the district court’s assertion without proof that “the massive reduction in staff has made it **effectively impossible** for the Department to carry out its statutorily mandated functions.” *McMahon IV* at *17 (emphasis added). Both courts simply assumed that a RIF affecting one-third of the Department’s workforce would render the Department unable to carry out its statutory duties, even though the Department’s announcement stated that the Department would “continue to deliver on all statutory programs that fall under the agency’s purview....” App. at 7.

In addition, the decisions below assumed that the RIFs were “implemented to shut down” the Department; however, the RIF is a separate issue from closing the Department, which the Government has admitted will require Congressional authorization, as the district court clearly understood. *See* App. at 6. The RIF of one-third of the employees, and the President’s desire to shut down the Department with congressional approval, are clearly different issues, but were conflated by the courts below.

II. THE COURTS BELOW DID NOT BELIEVE IT NECESSARY FOR THEM TO DETERMINE “AT THIS JUNCTURE” THAT THE DISTRICT COURT HAD JURISDICTION TO ISSUE ITS INJUNCTION.

Most disturbing is the lower courts’ treatment of the Government’s well-developed arguments that the district court did not have jurisdiction to issue any

injunction. App. at 25-30. The First Circuit's treatment of the jurisdictional argument appeared almost cavalier, as it reasoned:

We do appreciate the appellants' concern that the CSRA may not be bypassed by the mere recharacterization of a challenge to a termination of employment. Still, we are loath **at this juncture** of the proceedings to attribute to Congress the intention in enacting the CSRA that the appellants appear to attribute to it. [*McMahon IV* at *13 (emphasis added).]

In essence, the court said that, although the district court may not have had jurisdiction to issue the injunction to impede the reduction in force, that was a secondary matter that could be considered later. The First Circuit addressed only one part of the Government's argument, stating that because it did not believe that *Thunder Basin Coal Co. v. Reich*, 510 U.S. 200 (1994), clearly deprived the district court of jurisdiction, it believed the directives in the President's Executive Order, as implemented by the Secretary of the Department of Education, should be stayed indefinitely — even if the injunction itself was unlawful. *Id.* at *12-13. This Court cannot sanction such an effort to put an indefinite hold on the policy effect of the 2024 Presidential elections based on an unresolved jurisdictional issue.

Yet such was the way this case was handled by the District of Massachusetts (and the First Circuit), which has been highly receptive to challenges to policies of the Trump Administration, having issued 12 of the 92 total number of injunctions that these *amici* have identified thus far. *See Appendix.*

III. RESPONDENTS FAILED TO BRING ANY VALID CLAIMS AGAINST PETITIONERS.

This case comes to this Court on the application for a stay, where the burden is on the Government to demonstrate the elements of a stay. Here, the injunctions were issued in the absence of Respondents demonstrating any plausible likelihood of success on the merits. The Respondents proffered two alleged causes of action, “contending that the RIF violated the U.S. Constitution and the Administrative Procedure Act (APA).” *McMahon IV* at *4. Neither claim states a valid cause of action.

As a threshold matter, it is unusual that these claims were not brought by federal employees being RIF’d, but rather by those who receive funds from the Department of Education under grants or contracts. Yet, the true nature of the claim can be seen in relief that was sought: a reversal of DOE personnel actions. Respondents’ theory is that since a significant number of DOE employees are being terminated, there might not be enough employees left to authorize the spending of money which they are entitled to receive. As explained by the Government, this theory is also groundless and speculative. *See App. at 3.* In truth, Respondents’ legal theory is so indirect and implausible that it raises the question as to what may have been the real reason for New York Attorney General Letitia James to bring this suit naming President Trump as a defendant,³ as well as his Administration.

³ The district court never addressed whether New York should have named the President as a defendant, but the injunction apparently did not apply to President Trump. Actually, the New York Attorney General should have understood that such an action should never even be brought. In *Franklin v. Massachusetts*, 505 U.S. 788, 803 (1992), this Court explained that, while a district court could enjoin an executive

One possible reason is that the State of New York and an assembly of other states in Democrat control, led by Attorney General Letitia James, might want to impede the actions of President Trump and his Administration. Also, one matter of curiosity is why Attorney General Letitia James purposively avoided filing this challenge in a district court in New York State, which is in the Second Circuit, rather than in the District of Massachusetts, which is in the First Circuit.

As to the APA claim, it is true the APA “embodies the basic presumption of judicial review.” *Abbott Labs. v. Gardner*, 387 U.S. 136, 140 (1967). However, the general rule applies only “**so long as no statute precludes such relief or the action is not one committed by law to agency discretion.**” *Id.* (emphasis added). As the Government argues, the CSRA is a comprehensive scheme for challenges to federal employee terminations. App. at 26-27. The district court ruled:

Under the APA, a court shall “hold unlawful and set aside agency action ... found to be ... contrary to constitutional right.” 5 U.S.C. § 706(2)(B). For the same reasons that I find a likelihood of success on the merits of Consolidated Plaintiffs’ constitutional claims, I also find a likelihood of success on this count. [*McMahon I* at *83 n.16.]

But the APA exception for review of constitutional claims does not authorize review for all “constitutional violations,” only for all actions “contrary to constitutional right.” Here, the alleged constitutional “violations” involve only the structural principle of

branch official, it could not enjoin the President himself. For official acts, the President is not subject to the jurisdiction of the judiciary — a coequal, not superior, branch of government.

separation of powers and the President’s duty to “take care” that the laws be faithfully executed. Neither of these claims touch on any constitutional right.

This Court has recognized that “claims simply alleging that the President has exceeded his statutory authority are not ‘constitutional’ claims, subject to judicial review....” *Dalton v. Specter*, 511 U.S. 462, 473 (1994). *Dalton* undermines Respondents’ “separation of powers” and Take Care Clause claims which are quintessential examples of “generalized grievances” lacking any “particularity,” and neither confers any individualized “constitutional right” on any federal employee, let alone the hopelessly attenuated Respondents herein. The Respondents not only fail to demonstrate an entitlement to injunctive relief and fail to achieve standing, but they also fail to state a cause of action on which relief can be granted by a district court.

IV. LONG HISTORICAL PRACTICE EVINCES THAT REDUCTIONS IN FORCE ARE THE PREROGATIVE OF THE EXECUTIVE BRANCH.

The Government recently noted in another case: “Congress has expressly recognized agencies’ authority to implement RIFs since shortly after the Civil War...” Defendants’ Opposition to Plaintiffs’ Motion for a Temporary Restraining Order and Order to Show Cause, *AFGE v. Trump*, Case No. 3:25-cv-3698 (N.D. Cal. 2025), Dkt. 60, at 40 (“AFGE Def. Opp.”) (May 7, 2025). This longstanding practice is sourced in statute. In 5 U.S.C. § 3502(a), Congress provided that OPM “shall prescribe regulations for the release of competing employees in a **reduction in force** which give due effect to — (1) tenure of employment; (2) military preference...; (3) length of service; and (4) efficiency or performance ratings.” (Emphasis added.) Previous RIFs by

previous Presidents passed without any apparent concern by the courts. AFGE Def. Opp. at 9-11. President Reagan’s RIFs downsized 33,000 federal workers in his first term alone.⁴ “[D]uring the Reagan administration ... more than 800 of 11,500 [General Services Administration] employees received reduction-in-force notices.”⁵ During Reagan’s administration, “reductions led to a 7.2 percent cut to non-defense personnel.”⁶ President Clinton called for “reinventing government.” Under Clinton’s “National Performance Review (NPR) ... between 1993 and 1998, the federal workforce shrank 15.4 percent.” *Id.* at 1. The Congressional Research Service recently noted that agencies have had “discretion to determine if a RIF is necessary, the number and types of positions needed to be abolished, and the timing of when a RIF occurs.”⁷

The D.C. Circuit upheld President Reagan’s 1981 hiring freeze against a challenge by employee unions. There, the circuit court noted that “the President did not attempt to rescind the appointment authority of the department heads. Instead, he directed the relevant appointing authorities to implement the freeze and issued ‘instructions’ for them to follow.” *National Treasury Employees Union v. Reagan*, 663 F.2d 239, 250 (D.C. Cir. 1981). In President Clinton’s case, suit was filed by AFGE

⁴ G. Henderson, [“Reagan RIFs concentrated in Washington,”](#) *UPI* (Aug. 15, 1985).

⁵ F. Siddiqui, *et al.*, [“Federal layoffs ‘likely’ if too few employees choose to quit, memo says,”](#) *Washington Post* (Feb. 4, 2025).

⁶ [“A Study of the Long-Term Effects of Federal Workforce Reduction in the 1990s,”](#) at 1-2, *Coalition for Effective Change* (Mar. 2013).

⁷ T. Riccard, [“Reductions in Force \(RIFs\): An Overview,”](#) p. 1, *Congressional Research Service* (Feb. 13, 2025).

alleging that a Clinton RIF had improperly transferred jobs to a private contractor to allow for the plaintiffs' termination as federal employees. The Sixth Circuit dismissed the case on standing grounds. *AFGE v. Clinton*, 180 F.3d 727 (6th Cir. 1999). In contrast to the Trump Workforce EO, the Reagan and Clinton RIFs occurred without judicial interference.

The fact that this effort is brought in roundabout fashion by those recipients of federal funds who have a speculative fear that their funding stream may be impeded, still does not allow the district court below to order the reinstatement of federal employees.

CONCLUSION

For the foregoing reasons, this Court should stay the district court's preliminary injunction.

Respectfully submitted,

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APPENDIX

LINDA MCMAHON, SECRETARY OF EDUCATION, et al.

v.

STATE OF NEW YORK, et al.

BIRTHRIGHT CITIZENSHIP

1. [New Hampshire Indonesian Community Support v. Trump, No. 1:25-cv-00038](#) — Judge Joseph N. Laplante (G.W. Bush) of the District of New Hampshire enjoined any enforcement of Trump’s birthright citizenship EO within the state. The case was appealed to the [First Circuit](#) on April 11, where it is pending.
2. [Washington v. Trump, No. 2:25-cv-00127](#) — Judge John C. Coughenour (Reagan) of the Western District of Washington enjoined any enforcement of Trump’s birthright citizenship EO nationwide. The case was appealed to the [Ninth Circuit](#) and the [Supreme Court](#), where argument on the universal injunction was held May 15.
3. [New Jersey v. Trump; Doe v. Trump, No. 1:25-cv-10139](#) — Judge Leo T. Sorokin (Obama) of the District of Massachusetts enjoined any enforcement of Trump’s birthright citizenship EO within the state. The case was appealed to the [First Circuit](#) and the [Supreme Court](#), where argument on the universal injunction was held May 15.
4. [CASA Inc. v. Trump, No. 8:25-cv-00201](#) — Judge Deborah L. Boardman (Biden) of the District of Maryland enjoined any enforcement of Trump’s birthright citizenship EO nationwide. The case was appealed to the [Fourth Circuit](#) and the [Supreme Court](#), where argument on the universal injunction was held May 15.

IMMIGRATION

5. [J.G.G. v. Trump, No. 1:25-cv-00766](#) — Judge James E. Boasberg (Obama) of the District of D.C. ordered flights of gang members and terrorists rerouted back to the United States, and then ordered that Trump cannot deport anyone under the Alien Enemies Act (“AEA”) without a hearing. This was upheld by D.C. Circuit, then on April 7, on [Application for Stay](#), the Supreme Court [vacated the district court’s TROs](#). Judge Boasberg on April 16 [threatened the Trump administration](#) with criminal contempt charges, but on April 18 the DC Circuit issued an [administrative stay](#) in the appeal from Judge Boasberg’s Apr. 16 contempt-related order. Plaintiffs filed an [April 24 amended complaint](#) including a habeas petition for a class of individuals and an April 25 [motion for a permanent injunction](#). Judge Boasberg granted [class certification and preliminary injunction](#) June 4th. The Administration on June 10 filed for a stay pending appeal [at the District Court](#) ([denied June 12](#)) and on June 10, the DC Circuit [stayed the June 4 order](#).

6. [*Chung v. Trump*, No. 1:25-cv-02412](#) — Judge Naomi R. Buchwald (Clinton) of the Southern District of New York issued a [temporary restraining order](#) on March 24, and a [preliminary injunction](#) June 5, preventing Trump from deporting a Columbia University student for pro-Hamas activism.
7. [*Phila. Yearly Meeting of The Religious Soc’y of Friends v. U.S. Dep’t of Homeland Sec.*, No. 8:2025-cv-00243](#) — Judge Theodore D. Chuang (Obama) of the District of Maryland on Feb. 24 issued a [preliminary injunction](#) blocking ICE raids in houses of worship. The case has been appealed to the [Fourth Circuit](#).
8. [*M.K. v. Joyce*, No. 1:25-cv-01935](#) — Judge Jesse M. Furman (Obama) of the Southern District of New York issued a temporary restraining order forbidding the removal by ICE detention and deportation of Palestinian activist Mahmoud Khalil, a green card holder, and recent graduate of Columbia University, who organized pro-Palestinian demonstrations. This case was transferred on March 19 as [*Khalil v. Joyce*, 2:25-cv-01963](#) — Judge Michael E. Farbiarz (Biden) of the District of New Jersey ordered on that same day that “Petitioner shall not be removed from the United States unless and until the Court issues a contrary Order.” Judge Farbiarz granted [habeas and a preliminary injunction](#) on June 11, but on June 13 allowed the government to [continue detention on another charge](#).
9. [*Parra v. Castro*, No. 1:24-cv-00912](#) — Judge Kenneth J. Gonzales (Obama) of the District of New Mexico issued a [temporary restraining order](#) on February 9 blocking the transfer of three Venezuelans to Gitmo. They were then removed to their home country instead and voluntarily dismissed their case.
10. [*Vizguerra-Ramirez v. Choate*, No. 1:25-cv-00881](#) — Judge Nina Y. Wang (Biden) of the District of Colorado enjoined the ICE deportation of a Mexican citizen.
11. [*National TPS Alliance v. Noem*, No. 3:25-cv-01766](#) — Judge Edward M. Chen (Obama) of the Northern District of California enjoined ending Temporary Protected Status (“TPS”) for 350,000 to 600,000 Venezuelans. After the [Ninth Circuit](#) on April 18 [denied a stay](#) pending appeal, the [Supreme Court](#) on [May 19](#) [stayed the district court](#) decision.
12. [*Pacito v. Trump*, No. 2:25-cv-00255](#) — Judge Jamal N. Whitehead (Biden) of the Western District of Washington granted a nationwide preliminary injunction on February 28 blocking President Trump’s Executive Order indefinitely halting entry through the U.S. Refugee Admissions Program (USRAP). On appeal, the [Ninth Circuit](#) on March 25 [partially granted](#) the Trump administration’s emergency motion to stay, and filed an [order clarifying their stay](#) on April 21.

13. [*City and County of San Francisco v. Donald J. Trump*, No. 3:25-cv-01350](#) — Judge William H. Orrick III (Obama) of the Northern District of California granted a [preliminary injunction](#) April 24 enjoining President Trump’s efforts to have the Department of Justice investigate and prosecute “sanctuary cities” policies and government officials interfering with immigration enforcement. At the plaintiffs’ request, on May 9, Judge Orrick issued a [“clarifying” of the injunction](#),
14. [*D.V.D. v. U.S. Department of Homeland Security*, No. 1:25-cv-10676](#) — Judge Brian E. Murphy (Biden) of the District of Massachusetts on March 28 issued a [temporary restraining order](#) enjoining the Trump administration over the recent policy of deporting non-citizens with final removal orders to a third country, specifically El Salvador, without first providing an opportunity to contest removal. [First Circuit](#) denied stay pending appeal April 7. Judge Murphy granted class certification and issued a [preliminary injunction](#) April 18, and further orders on [May 20](#), May 21, May 23, and May 26. [SCOTUS Application](#) for Stay was filed May 27, and the case was remanded to the Fifth Circuit, where briefs are pending, with oral argument scheduled June 30.
15. [*Community Legal Services in East Palo Alto v. U.S. Dep’t of HHS*, No. 3:25-cv-02847](#) — Judge Araceli Martinez-Olguin (Biden) of the Northern District of California issued a [temporary restraining order](#) on April 1 blocking Defendants from terminating funding for Department of Health and Human Services’ (HHS) Office of Refugee Resettlement (ORR) funding for legal representation services for unaccompanied immigrant children through April 16, then on April 10 [extended the TRO](#) through April 30. Defendants’ appeal of the TRO to the Ninth Circuit [was denied](#), as was a petition for [rehearing en banc](#). On April 29, the District Court granted a [preliminary injunction](#) blocking Defendants from withdrawing the services or funds provided by ORR until a final judgment in the matter is issued. Defendants appealed the PI to the [Ninth Circuit](#) on April 30, stay pending appeal denied [May 14](#), order updated [May 20](#); and [Trump administration opening brief](#) was filed June 12.
16. [*J.A.V. v. Trump*, No. 1:25-cv-00072](#) — Judge Fernando Rodriguez (Trump) of the Southern District of Texas on April 9 [temporarily enjoined](#) the Trump administration from deporting Venezuelans outside of the district under the Alien Enemies Act. On May 1, Judge Rodriguez certified a class and granted a [permanent injunction](#).
17. [*G.F.F. v. Trump*, No. 1:25-cv-02886](#) — Judge Alvin Hellerstein (Clinton) of the Southern District of New York granted a [temporary restraining order](#) on April 9 on behalf of a class of all persons in the district subject to deportation under the Alien Enemies Act. A [Preliminary Injunction](#) was granted May 6.

18. [*Doe v. Noem*, No. 1:25-cv-10495](#) — Judge Indira Talwani (Obama) of the District of Massachusetts, on April 14, granted a [motion to stay](#) the Department of Homeland Security’s blanket revocation of Cuba, Haiti, Nicaragua, and Venezuela parole programs (the “CHNV parole programs”) and ordering case-by-case review of any termination of work authorization permits to remain in the United States. After the First Circuit denied a stay, the Supreme Court on [May 30 stayed the district court decision](#).

19. [*Viloria Aviles v. Trump*, No. 2:25-cv-00611](#) — Judge Gloria Maria Navarro (Obama) of the District of Nevada issued a [preliminary injunction](#) on April 17 prohibiting the government from removing the Petitioner from the United States under the Alien Enemies Act until after his merits hearing.

20. [*D.B.U. v. Trump*, No. 1:25-cv-01163](#) — Judge Charlotte Sweeney (Biden) of the District of Colorado issued a [temporary restraining order](#) on April 22 forbidding the administration from removing Venezuelan illegal aliens from Colorado for deportation under the Aliens Enemies Act. A motion for a preliminary injunction is pending. On [appeal to the Tenth Circuit](#), a panel on [April 29 denied an emergency motion](#) for stay.

21. [*A.S.R. v. Trump*, No. 3:25-cv-00113](#) — Judge Stephanie Haines (Trump) of the Western District of Pennsylvania granted a [temporary restraining order on April 25](#) on behalf of a class of all persons in the district subject to deportation under the Alien Enemies Act that they must be given 14 days’ notice and hearing before any removal from the district, pursuant to the Supreme Court’s decision in *J.G.G. v. Trump*.

22. [*Mahdawi v. Trump*, No. 2:25-cv-00389](#) — Judge Geoffrey W. Crawford (Obama) of the District of Vermont extended a [temporary restraining order](#) on April 24 “for a period of 90 days or until dismissal of this case or grant of a preliminary injunction, whichever is earliest ... no respondent... shall remove [Mohsen Mahdawi, a Palestinian] from Vermont without further order from this court.”

23. [*Yostin Sleiker Gutierrez-Contreras v. Warden Desert View Annex*, No. 5:25-cv-00911](#) — Judge Sunshine S. Sykes (Biden) of the Central District of California, issued a [temporary restraining order](#) on April 16 preventing the government from removing a Venezuelan at risk of being deported to El Salvador under the Alien Enemies Act. On April 28, the TRO was dissolved since the Plaintiff was in Texas when the petition was filed.

24. [*President and Fellows of Harvard v. Department of Homeland Security*, No. 1:25-cv-11472](#) — Judge Allison D. Burroughs (Obama) of the District of Massachusetts issued a [temporary restraining order](#) on May 23, blocking the

administration from revoking Harvard's ability to enroll international students under the Student and Exchange Visitor Program (SEVP). After President Trump issued a new proclamation on June 4, Judge Burroughs issued another [temporary restraining order](#) on June 5.

25. [Arevalo Millan v. Trump, No. 5:25-cv-01207](#) — Judge John W. Holcomb (Trump) of the Central District of California on May 19 certified a class of noncitizens in the district subject to the Alien Enemies Act ("AEA") and granted a [temporary restraining order](#). On June 2nd, Judge Holcomb issued a [preliminary injunction](#) against deporting members of the class under authority of AEA.

26. [Y.A.P.A. v. Trump, No. 4:25-cv-00144](#) — Judge Clay D. Land (G.W. Bush) of the Middle District of Georgia on May 21 granted a [temporary restraining order](#) blocking deportation of a Venezuelan man, at risk of deportation to El Salvador, under the Alien Enemies Act. The court did not block deportation under INA.

*NOTE: [According to Politico](#), there have been over 100 lawsuits and 50 restraining orders related to the F-1 visas and the Student and Exchange Visitor Information System (SEVIS) in 23 states. The Trump Administration is working to resolve this situation, so these cases are not included here.

TRANSGENDER

27. [Talbot v. Trump, No. 1:25-cv-00240](#) — Judge Ana C. Reyes (Biden) of the District of D.C., a lesbian, enjoined Trump's rule preventing "transgender" persons from serving in the military. The case is on appeal to the D.C. Circuit.

28. [PFLAG v. Trump, No. 8:25-cv-00337](#) — Judge Brendan A. Hurson (Biden) of the District of Maryland granted an injunction against Trump's order denying federal funding to institutions performing chemical or surgical "transgender" mutilation on minors.

29. [Washington v. Trump, No. 2:25-cv-00244](#) — Judge Lauren J. King (Biden) of the Western District of Washington enjoined Trump's order denying federal funding to institutions performing chemical or surgical "transgender" mutilation on minors. The case is on appeal to the Ninth Circuit.

30. [Ireland v. Hegseth, No. 1:25-cv-01918](#) — Judge Christine P. O'Hearn (Biden) of the District of New Jersey enjoined the Air Force from removing two "transgender" service members pursuant to Trump's order banning "transgender" service members.

31. [*Doe v. McHenry; Doe v. Bondi*, No. 1:25-cv-00286](#) — Judge Royce C. Lamberth (Reagan) of the District of D.C. enjoined the transfer of twelve “transgender women” to men’s prisons under Trump’s order, and terminating their taxpayer-funded hormone treatments. The injunction has been appealed to the D.C. Circuit.

32. [*Moe v. Trump*, No. 1:25-cv-10195](#) — Senior Judge George A. O’Toole Jr. (Clinton) of the District of Massachusetts enjoined the transfer of a “transgender woman” to a men’s prison under Trump’s order. This case has been transferred to another, unidentified, district.

33. [*Jones v. Trump*, No. 1:25-cv-401](#) — Judge Royce C. Lamberth (Reagan) of the District of D.C. enjoined the transfer of three “transgender women” to men’s prisons and termination of their taxpayer-funded hormone treatments under Trump’s order.

34. [*Shilling v. Trump*, No. 2:25-cv-00241](#) — Judge Benjamin H. Settle (G.W. Bush) of the Western District of Washington enjoined Trump’s order to remove “transgender” service members. The Ninth Circuit denied a request for a stay of the injunction; an Application for Stay filed at the Supreme Court ([24A1030](#)), and the stay was granted May 6.

35. [*Maine v. Department of Agriculture*, No. 1:25-cv-00131](#) — Judge John Woodcock (G.W. Bush) of the District of Maine granted a [temporary restraining order](#) on April 11 on behalf of Maine, in its lawsuit against Trump’s federal education funding freeze to Maine for its refusal to ban boys from girls’ teams.

GOVERNMENT OPERATIONS

36. [*Dellinger v. Bessent*, No. 1:25-cv-00385](#) — Judge Amy B. Jackson (Obama) of the District of D.C. issued a restraining order invalidating Trump’s firing of U.S. special counsel Hampton Dellinger. The order was upheld by the D.C. Circuit Court of Appeals and the Supreme Court, then was temporarily lifted by the Court of Appeals on March 5; on March 6, Dellinger announced that he was dropping his case.

37. [*American Federation of Government Employees, AFL-CIO v. U.S. Office of Personnel Management*, No. 3:25-cv-01780](#) — Judge William H. Alsup (Clinton) of the Northern District of California enjoined Trump’s order for six federal agencies to dismiss thousands of probationary employees. The injunction was upheld by the [Ninth Circuit](#), and the Supreme Court issued a [stay based on standing](#).

38. [*Wilcox v. Trump*, No. 1:25-cv-00334](#) — Judge Beryl A. Howell (Obama) of the District of D.C. enjoined Trump’s firing of National Labor Relations Board member Gwynne Wilcox, a Democrat, and ordered her reinstated to finish her term. The

[D.C. Circuit](#) stayed the injunction, then reinstated it, and an [application for a stay](#) at the Supreme Court was [granted by Chief Justice Roberts](#) on April 9, and by the [Supreme Court on May 22](#).

39. [*Harris v. Bessent*, No. 1:25-cv-00412](#) — Judge Rudolph Contreras (Obama) of the District of D.C. enjoined Trump’s firing of Merit Systems Protection Board member Cathy Harris and ordered her reinstated. The [D.C. Circuit](#) stayed the injunction, then reinstated it, an [application for a stay](#) at the Supreme Court was [granted by Chief Justice Roberts](#) on April 9, and by the [Supreme Court on May 22](#).

40. [*American Foreign Service Association v. Trump*, No. 1:25-cv-00352](#) — Judge Carl J. Nichols (Trump) of the District of D.C. issued a temporary restraining order against Trump’s firing of USAID employees. He later vacated the TRO and denied a preliminary injunction against the firings.

41. [*Does 1-9 v. Department of Justice*, No. 1:25-cv-00325](#) — Judge Jia M. Cobb (Biden) of the District of D.C. enjoined Trump from releasing the names of any FBI agents who worked on the January 6 investigation.

42. [*Doctors for America v. U.S. Office of Personnel Management*, No. 1:25-cv-00322](#) — Judge John D. Bates (G.W. Bush) of the District of D.C. ordered that CDC and FDA webpages that “inculcate or promote gender ideology” be restored after Trump ordered them removed.

43. [*Perkins Coie v. DOJ*, No. 1:25-cv-00716](#) — Judge Beryl A. Howell (Obama) of the District of D.C. enjoined Trump’s directive barring government agencies doing business with Perkins Coie and banning PC attorneys from federal buildings.

44. [*Jenner Block v. DOJ*, No. 1:25-cv-00916](#) — Judge John D. Bates (G.W. Bush) of the District of D.C. on March 28 granted a [temporary restraining order](#) against Trump’s directive barring government agencies from doing business with Jenner Block and banning that firm’s attorneys from federal buildings. Judge Block granted Jenner’s motions for summary judgment and [permanent injunction on May 23](#).

45. [*Wilmer Cutler Pickering Hale and Dorr LLP v. Executive Office of the President*, No. 1:25-cv-00917](#) — Judge Richard J. Leon (G.W. Bush) of the District of D.C. enjoined Trump’s directive barring government agencies from doing business with Wilmer and banning that firm’s attorneys from federal buildings.

46. [*Susman Godfrey LLP v. Executive Office of the President*, No. 1:25-cv-01107](#) — Judge Loren L. AliKhan (Biden) of the District of D.C. on [April 15 enjoined](#) Trump’s

directive barring government agencies from doing business with Susman Godfrey and banning that firm's attorneys from federal buildings.

47. [*American Federation of Government Employees, AFL-CIO v. Ezell*, No. 1:25-cv-10276](#) — Senior Judge George A. O'Toole Jr. (Clinton) of the District of Massachusetts issued a temporary restraining order against Trump's buyout of federal employees. The judge later lifted the TRO and denied an injunction, allowing the buyout to go forward.

48. [*Maryland v. US Dept. of Agriculture*, No. 1:25-cv-00748](#) — James K. Bredar (Obama) of the District of Maryland issued a TRO ordering 38 agencies to stop firing employees and reinstate fired employees. On April 9, the Fourth Circuit [stayed the district court injunction](#), noting the [Supreme Court's stay](#) in [*AFGE, AFL-CIO v. OPM and Ezell*](#).

49. [*Does 1-26 v. Musk*, No. 8:25-cv-00462](#) — Judge Theodore D. Chuang (Obama) of the District of Maryland ordered DOGE to reinstate email access for fired USAID employees.

50. [*American Federation of Teachers v. Bessent*, No. 8:25-cv-00430](#) — Judge Deborah L. Boardman (Biden) of the District of Maryland enjoined DOE and Office of Personnel Management from disclosing personal information of employees to DOGE. On April 7, the Fourth Circuit [granted a stay](#) to the Defendants pending the appeal.

51. [*American Federation of State, County and Municipal Employees, AFL-CIO v. Social Security Administration*, No. 1:25-cv-00596](#) — Judge Ellen L. Hollander (Obama) of the District of Maryland granted an injunction forbidding the Social Security Administration from providing personal information to DOGE. The [Fourth Circuit](#) dismissed an appeal for [lack jurisdiction](#). On May 2, the Trump administration filed an [Application for a Stay](#) at the Supreme Court, which was [granted on June 6](#).

52. [*Brehm v. Morocco*, No. 1:25-cv-00660](#) — Judge Richard J. Leon (G.W. Bush) of the District of D.C. issued a temporary restraining order forbidding Trump from removing Brehm from, and appointing Morocco to, the U.S. African Development Foundation.

53. [*American Oversight v. Hegseth*, No. 1:25-cv-00883](#) — Judge James E. Boasberg (Obama) of the District of D.C. issued an order "as agreed by the parties," for the government to preserve all Signal communications related to the leak to an *Atlantic* editor of DoD conversations in Houthi strike.

54. [*National Treasury Employees Union v. Trump*, No. 1:25-cv-00935](#) — Judge Paul Friedman (Clinton) of the District of D.C., on April 25, [enjoined agencies](#) from implementing Trump’s executive order limiting collective bargaining rights for many federal employees, but specifically did not enjoin President Trump.

55. [*Woonasquatucket River Watershed Council v. Department of Agriculture*, No. 1:25-cv-00097](#) — Judge Mary McElroy (Trump) of the District of Rhode Island issued a [preliminary injunction](#) against Trump’s federal funding freeze for various departments including the EPA. The Trump administration [appealed to the First Circuit](#) on May 1.

56. [*Associated Press v. Budowich*, No. 1:25-cv-00532](#) — Judge Trevor McFadden (Trump) of the District of D.C. on [April 8 enjoined](#) the White House from keeping AP reporters out of the White House press briefings until it agrees to refer to the “Gulf of America.”

57. [*Novedades Y Servicios, Inc. v. FinCEN*, 3:25-cv-00886](#) — Judge Janis L. Sammartino (G.W. Bush) of the Southern District of California granted a [temporary restraining order](#) on April 22 against Department of Treasury FinCEN’s Geographic Targeting Order which requires businesses along the southern border to file Currency Transaction Reports with FinCEN at a \$200 threshold.

58. [*New York, et al. v. Donald J. Trump*, No. 1:25-cv-01144](#) — Judge Jeannette A. Vargas (Biden) of the Southern District of New York issued a [preliminary injunction](#) on February 21 blocking DOGE’s access to certain Treasury Department payment records. Then on April 11, Judge Vargas [partially dissolved her preliminary injunction](#) since “based on existing record” mitigation, training and vetting procedures were adequate to satisfy her concerns.

59. [*American Federation Of Government Employees, AFL-CIO v. Trump*, No. 3:25-cv-03698](#) — Judge Susan Y. Illston (Clinton) of the Northern District of California granted a [Temporary Restraining Order](#) on May 9 to pause the Defendants’ reductions in force under EO 14210, and issued a Preliminary Injunction on May 22. Defendants immediately appealed this order to the [Ninth Circuit](#), and filed an Application for a stay at the US Supreme Court on June 2.

60. [*National Job Corps Association v. Department of Labor*, No. 1:25-cv-04641](#) — Judge Andrew L. Carter Jr. (Obama) of the Southern District of New York issued a [temporary restraining order](#) on June 4, the day after National Job Corps Association sued the Department of Labor over the Trump administration’s termination of contracts for operation of Job Corps centers.

61. [*Maryland v. Corporation for National and Community Service*, No. 1:25-cv-01363](#) — Judge Deborah L. Boardman (Biden) of the District of Maryland issued a preliminary injunction on June 5, blocking the administration's reduction in force (RIF) and cancellation of programs at AmeriCorps.
62. [*American Federation of Government Employees v. Noem*, No. 2:25-cv-00451](#) — Judge Marsha J. Pechman (Clinton) of the Western District of Washington granted a [preliminary injunction](#) on June 2, blocking the Transportation Security Administration's cancellation of their collective bargaining agreement.
63. [*Learning Resources Inc. v. Trump*, No. 1:25-cv-01248](#) — Judge Rudolph Contreras (Obama) of the District of D.C. on May 29 granted a [preliminary injunction](#) blocking President Trump's global tariffs under the International Emergency Economic Powers Act and denying the [government's motion](#) to transfer the case to the U.S. Court of International Trade. The administration has [appealed to the DC Circuit](#), and Judge Contreras on June 3 [stayed his own injunction](#) after Court of Appeals for the Federal Circuit action in a related case.

FUNDING

64. [*National Treasury Employees Union v. Vought*, No. 1:25-cv-00381](#) — Judge Amy B. Jackson (Obama) of the District of D.C. halted Trump's budget cuts and layoffs at the Consumer Financial Protection Bureau. On March 31, the [government appealed](#) Judge Jackson's preliminary injunction order to the D.C. Circuit; which on April 11 ordered a [partial stay](#) of the preliminary injunction.
65. [*AIDS Vaccine Advocacy Coalition v. Department of State*, No. 1:25-cv-00400](#) — Judge Amir H. Ali (Biden) of the District of D.C. ordered Trump to unfreeze and spend \$2 billion in USAID funds. The Supreme Court, in a 5-4 ruling with Justices Alito, Thomas, Kavanaugh, and Gorsuch dissenting, left the [order in place](#). On Apr. 2, [defendants appealed](#) Judge Ali's Mar. 10 preliminary injunction order to the D.C. Circuit.
66. [*Colorado v. US Dept. of Health and Human Services*, No. 1:25-cv-00121](#) — Judge Mary S. McElroy (Trump) of the District of Rhode Island, issued a [temporary restraining order](#) on April 5 reinstating payments to a coalition of states which sued the Trump administration over the cancellation of \$11 billion in public health funding.
67. [*National Council of Nonprofits v. OMB*, No. 1:25-cv-00239](#) — Judge Loren L. AliKhan (Biden) of the District of D.C. blocked Trump's order to pause federal aid while reviewing to determine if it aligned with administration policy. Appeal to the D.C. Circuit [docketed April 25](#).

68. [*Massachusetts v. NIH*, No. 1:25-cv-10338](#) — Judge Angel Kelley (Biden) of the District of Massachusetts issued a preliminary injunction on March 5 prohibiting implementation of the NIH Guidance “in any form with respect to institutions nationwide.”
69. [*New York v. Trump*, No. 1:25-cv-00039](#) — Judge John J. McConnell Jr. (Obama) of the District of Rhode Island enjoined Trump’s order to freeze federal spending while reviewing to determine that it aligned with administration policy. The [*First Circuit*](#), on March 26, denied defendants’ motion for a stay pending appeal of the district court’s preliminary injunction order.
70. [*RFE/RL, Inc. v. Lake*, No. 1:25-cv-00799](#) — Judge Royce C. Lamberth (Reagan) of the District of D.C. granted a [*temporary restraining order*](#) March 25, forbidding Trump from cutting funds to Voice of America. The [*TRO was extended*](#) on April 8, and another [*TRO was granted*](#) on April 29. On appeal to the [*DC Circuit*](#), an [*administrative stay*](#) was granted by a panel on May 1, but on May 7, the DC Circuit en banc overruled the panel, [*restoring the district court’s stay*](#). On May 30, Judge Lamberth granted an [*order*](#) requiring the government to immediately disburse \$12,174,979 to cover RFE/RL’s expenditures for the month of May 2025.
71. [*Widakuswara v. Lake*, No. 1:25-cv-01015](#) — Judge Royce C. Lamberth (Reagan) of the District of D.C. issued a [*preliminary injunction on April 22*](#) requiring the reinstatement of employment positions and funding for Voice of America and U.S. Agency for Global Media. The government [*appealed to the DC Circuit*](#) April 24.
72. [*Radio Free Asia v. United States of America*, No. 1:25-cv-00907](#) — Judge Royce C. Lamberth (Reagan) of the District of D.C. issued a preliminary injunction requiring restoration of funding of Radio Free Asia and Middle East Broadcasting Networks on April 25. The government immediately filed an [*appeal to the D.C. Circuit*](#), which granted a [*stay pending appeal*](#) on May 3.
73. [*Massachusetts Fair Housing Ctr. v. HUD*, No. 3:25-cv-30041](#) — Judge Richard G. Stearns (Clinton) of the District of Massachusetts enjoined Trump’s cuts to HUD grant funding and ordered spending reinstated.
74. [*Climate United Fund v. Citibank, N.A.*, No. 1:25-cv-00698](#) — Judge Tanya S. Chutkan (Obama) of the District of D.C. issued a temporary restraining order enjoining EPA’s Termination of Greenhouse Gas Reduction Fund Grants.
75. [*Association of American Medical Colleges v. NIH*, No. 1:25-cv-10340](#) — Judge Angel Kelley (Biden) of the District of Massachusetts enjoined Trump’s NIH grant funding cuts. The Case has been [*appealed to the First Circuit*](#).

76. [*American Association of Colleges for Teacher Education v. McMahon*, No. 1:25-cv-00702](#) — Judge Julie R. Rubin (Biden) of the District of Maryland issued an injunction requiring reinstatement of terminated education grant funds. [Defendants appealed](#) the preliminary injunction to the Fourth Circuit. On April 1, the Fourth Circuit denied Plaintiffs' motion to place the case in abeyance, and on April 10, granted the defendants' motion for stay pending appeal.
77. [*Mayor and City Council of Baltimore et al. v. Vought*, No. 1:25-cv-00458](#) — Judge Matthew J. Maddox (Biden) of the District of Maryland issued a TRO preventing Trump from defunding the CFPB.
78. [*Association of American Universities v. Department of Health and Human Services*, No. 1:25-cv-10346](#) — Judge Angel Kelley (Biden) of the District of Massachusetts issued a nationwide injunction against Trump's NIH funding cuts. [Defendants appealed](#) to the First Circuit on April 9.
79. [*Association of American Universities v. Dept. of Energy*, No. 1:25-cv-10912](#) — Judge Allison D. Burroughs (Obama) of the District of Massachusetts issued a [temporary restraining order](#) on April 16 against the cap instituted on reimbursements for indirect costs for federal research grants from the Department of Energy.
80. [*American Library Association v. Sonderling*, No. 1:25-cv-01050](#) — Judge Richard J. Leon (G.W. Bush) of the District of D.C. granted a [temporary restraining order](#) on May 1 against the executive order which requires spending reduction of the Institute for Museum and Library Services.
81. [*Rhode Island v. Trump*, No. 1:25-cv-00128](#) — Chief Judge John J. McConnell, Jr. (Obama) of the District of Rhode Island, granted a preliminary injunction on May 6 to a coalition of states which sued over an Executive Order which requires 7 agencies to reduce their functions.
82. [*State of New York v. U.S. Dep't of Education*, No. 1:25-cv-02990](#) — Judge Edgardo Ramos (Obama) of the Southern District of New York granted a preliminary injunction that prohibits the U.S. Department of Education from cancelling over \$1 billion in unspent COVID-19 pandemic funding grants extended past the original deadline by the prior administration.
83. [*San Fransisco U.S.D. v. AmeriCorps*, 3:25-cv-02425](#) — Judge Edward M. Chen (Obama) of the Northern District of California granted a [temporary restraining order](#) on March 31 after San Francisco Unified School District sued over actions taken to fire employees and freeze grant funding at AmeriCorps.

84. [*Citizens for Responsibility and Ethics in Washington v. U.S. DOGE Service*, 1:25-cv-00511](#) — Judge Christopher R. Cooper (Obama) of the District of D.C. issued a [preliminary injunction](#) on March 10 in a lawsuit against DOGE and Elon Musk regarding compliance with FOIA and the Federal Records Act.

ELECTIONS

85. [*League of United Latin American Citizens v. EOP*, No. 1:25-cv-00946](#) — Judge Colleen Kollar-Kotelly (Clinton) of the District of D.C. granted a [universal injunction](#) on April 24 against Executive Order 14,248, requiring documentary proof of United States citizenship to vote in Federal elections. This case consolidates three suits brought by racial minority associations and by Democrat Party, campaigns, and elected officials.

DEI-RELATED PROGRAMS

86. [*Nat'l Ass'n of Diversity Officers in Higher Educ. v. Trump*, No. 1:25-cv-00333](#) — Judge Adam B. Abelson (Biden) of the District of Maryland enjoined Trump's order blocking federal funding for DEI programs. On [March 14, the Fourth Circuit granted](#) the government's motion for a stay of the preliminary injunction pending appeal.

87. [*California v. Department of Education*, No. 1:25-cv-10548](#) — Judge Myong J. Joun (Biden) of the District of Massachusetts granted a temporary restraining order blocking Trump's withdrawal of funds to schools teaching DEI. The First Circuit [denied a motion](#) for stay pending appeal. On April 4, the [Supreme Court granted a stay](#) pending appeal, writing "the Government is likely to succeed in showing the District Court lacked jurisdiction" and that the case may need to be brought in the Court of Federal Claims.

88. [*Chicago Women in Trades v. Trump*, No. 1:25-cv-02005](#) — Senior Judge Matthew F. Kennelly (Clinton) of the Northern District of Illinois entered a temporary restraining order commanding the reinstatement of DEI grants.

89. [*Doe 1 v. Office of the Director of National Intelligence*, No. 1:25-cv-00300](#) — Judge Anthony J. Trenga (G.W. Bush) of the Eastern District of Virginia issued an "administrative stay" against firing DEI employees with CIA and DNI. The court then considered and rejected imposing a TRO to the same effect. On March 31, Judge Trenga granted a [preliminary injunction](#) enjoining the defendants. On May 6, defendants filed [notice of appeal](#) to the Fourth Circuit.

90. [*American Federation of Teachers v. U.S. Department of Education*, No. 1:25-cv-00628](#) — Judge Stephanie A. Gallagher (Trump) of the District of Maryland

enjoined the U.S. Department of Education’s February 14, 2025 “Dear Colleague Letter” ending diversity, equity, and inclusion practices in schools by threatening to withhold federal funding from those that refuse to comply.

91. [*National Education Association v. US Department of Education*, No. 1:25-cv-00091](#) — Judge Landya B. McCafferty (Obama) of the District of New Hampshire enjoined the U.S. Department of Education’s February 14, 2025 “Dear Colleague Letter” ending diversity, equity, and inclusion practices in schools by threatening to withhold federal funding from those that refuse to comply.

92. [*NAACP v. U.S. Department of Education*, No. 1:25-cv-01120](#) — Judge Dabney L. Friedrich (Trump) of the District of D.C. enjoined the U.S. Department of Education’s February 14, 2025 “Dear Colleague Letter” ending diversity, equity, and inclusion practices in schools by threatening to withhold federal funding from those that refuse to comply.