

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

State of Minnesota,
by and through its Attorney General,
Keith Ellison,

Case No.: 0:25-cv-04767-LMP-JFD

Plaintiff,

v.

United States Department of Agriculture
and Brooke Rollins, as Secretary of the
Department of Agriculture,

**PLAINTIFF’S MOTION FOR A
TEMPORARY RESTRAINING
ORDER OR EXPEDITED
PRELIMINARY INJUNCTION
OR STAY**

Defendants.

Plaintiff State of Minnesota, by and through its Attorney General Keith Ellison (“Minnesota”), moves the Court pursuant to Fed. R. Civ. P. 65(b), D. Minn. L.R. 7.1(d), and the Court’s inherent authority for a temporary restraining order that prohibits or stays enforcement of the Recertification Letter dated December 16, 2025 (“Recertification Letter”) by Defendants United States Department of Agriculture and Brooke Rollins, in her official capacity as Secretary of the United States Department of Agriculture (collectively, “USDA”).

Alternatively, Minnesota moves the Court pursuant to Fed. R. Civ. P. 65(a), D. Minn. L.R. 7.1(d), and the Court’s inherent authority for a preliminary injunction that prohibits or stays enforcement of the Recertification Letter by USDA, and Minnesota requests expedited handling.

Alternatively, Minnesota moves the Court pursuant to 5 U.S.C. § 705 and the Court's inherent authority for a stay of the Recertification Letter pending judicial review, and Minnesota requires expedited handling.

Minnesota requests expedited handling and emergency injunctive relief because of the immediate and irreparable harm faced by the State from the Recertification Letter. The Recertification Letter threatens to cut off Minnesota's Supplemental Nutrition Assistance Program ("SNAP") administrative funding unless Minnesota recertifies the eligibility of approximately 100,000 SNAP households within 30 days, *i.e.*, by January 15, 2016. The Recertification Letter further demands that Minnesota conduct in-person interviews with each of those households as part of the recertification process. USDA's demands are impossible for Minnesota to meet and pose an imminent threat to SNAP benefits in Minnesota.

Given the stated deadline in the Recertification Letter, Minnesota requests that the Court hold a hearing on the motion on **January 9, 2026**, and set an appropriate briefing schedule based off that hearing date. Minnesota further requests that the Court issue an order on the motion no later than **January 15, 2026**.

This motion is based on Minnesota's submissions to the Court, including Minnesota's memorandum of law supporting this motion, the supporting declarations, the forthcoming reply memorandum of law, arguments of counsel, and the other documents on record with the Court.

[signature on next page]

Dated: December 29, 2025

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