

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity
as SECRETARY OF THE U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 1:25-Civ-00196

PLAINTIFF STATES' NOTICE ADDRESSING *TRUMP V. CASA, INC.*

As requested in the Court's Preliminary Injunction Order, ECF No. 73, 56, Plaintiff States file this notice regarding the Supreme Court's recent opinion *Trump v. CASA, Inc.*, No. 24A884, 2025 WL 1773631 (June 27, 2025). The *CASA* decision does not affect the scope of the Court's preliminary injunction order.

As an initial matter, the *CASA* Court did not consider circumstances where, as here, the Court has authority "to issue all necessary and appropriate process to postpone the effective date of an agency action" under 5 U.S.C. § 705 during litigation and, ultimately, to vacate a judgment under 5 U.S.C. § 706. *CASA*, 2025 WL 1773631 at *8 n.10; *see also id.* *21 (Kavanaugh, J., concurring).

But this Court need not consider that issue here because, even if *CASA*'s reasoning were to apply with full force here, it would not warrant limiting the Court's preliminary injunction order. The *CASA* Court reaffirmed that courts may order complete relief between the parties. The key question is "whether an injunction will offer complete relief to the plaintiffs before the court." *CASA*, *11 (emphasis omitted). The Court anticipated situations, as here, where "it is all but

impossible for courts to craft relief that is both complete and benefits only the named plaintiffs.” *Id.* n.12 (emphasis omitted). In such cases, relief that incidentally benefits non-parties is permitted, *id.* *11, provided the relief is “no more burdensome to the defendant than necessary to provide complete relief to the plaintiffs.” *Id.* (quoting *Califano v. Yamasaki*, 442 U.S. 682, 702 (1979)) (emphasis omitted).

Here, the Court properly and intentionally “limit[ed] any injunctive relief to address any information or services to which it determine[d] the States have established an entitlement.” ECF No. 73, 56. Defendants provided no evidence of any plausible “narrower” remedy that assured Plaintiff States complete relief, and there is no practical way to grant the Plaintiff States complete relief for their informational and service-related injuries without that same relief incidentally affecting non-parties. For example, calculation of and updates to the Federal Poverty Guidelines apply nationwide; restoring the staff responsible for that work would redress Plaintiff States’ injury but would also provide an “incidental” benefit to non-parties while being no more “burdensome” on Defendants. *CASA*, *11. Defendants utterly failed to provide any evidence showing how the injunction could be narrowed while still affording Plaintiff States necessary relief or how any theoretical “patchwork injunction” would be workable. *CASA*, *12. As this court correctly found, Defendants in this case “have yet to proffer any evidence demonstrating that the planned terminations would not decimate the Congressionally created sub-agencies or inhibit them from fulfilling their mandates.” ECF No. 73, 46–47. Thus, this Court’s preliminary injunction properly provides relief solely between the parties here and is amply supported by the unrebutted record.

In sum, as this Court has found, the Plaintiffs have established a likelihood of success in demonstrating that the March 27 Directive was both arbitrary and capricious as well as contrary to law, ECF No. 73, 4, and Plaintiffs have carried all other necessary burdens for the injunctive relief

they have sought under the APA, including because it is necessary to provide complete relief in this case. Thus, this Court's injunction is unaffected by *CASA* and should stand.

Additionally, Plaintiffs note that the Supreme Court recently stayed the injunction issued in *Trump v. American Federation of Government Employees*, No. 24A1174 (July 8, 2025); *see also* Notice of Suppl. Auth., ECF No. 67-1. That stay decision has no bearing here because it did not address whether any particular agency's reduction-in-force or reorganization plan is illegal, *Am. Fed'n of Gov't Emps.*, 1, and did not review the legality of any such reduction-in-force or reorganization plan because they had not first been assessed by the district court. *Id.* 1–2 (“Those plans are not before this Court.”).

Dated: July 11, 2025

Respectfully submitted,

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