

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NORTHEAST ORGANIC FARMING  
ASSOCIATION OF NEW YORK,  
NATURAL RESOURCES DEFENSE  
COUNCIL, and ENVIRONMENTAL  
WORKING GROUP,

Plaintiffs,

v.

U.S. DEPARTMENT OF AGRICULTURE,

Defendant.

Civil Action No. 1:25-cv-01529  
(MMG)

**NOTICE OF PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE THAT Plaintiffs Northeast Organic Farming Association of New York, Natural Resources Defense Council, and Environmental Working Group respectfully move, under Federal Rule of Civil Procedure 65(a), for a preliminary injunction ordering Defendant U.S. Department of Agriculture to restore all webpages that it unlawfully removed pursuant to its January 30, 2025, directive to archive or unpublish climate-change-focused webpages and enjoining it from removing or substantially modifying additional webpages pursuant to that directive. In support of this Motion, Plaintiffs rely on the following documents:

- (1) Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction;
- (2) Declaration of Marcie Craig;
- (3) Declaration of Corinne Hansch;
- (4) Declaration of Jeffrey McManus;
- (5) Declaration of Garrett Rose; and
- (6) Declaration of Anne Schechinger.

Dated: March 17, 2025

Respectfully submitted,



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\*Application for admission pending

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