

ROB BONTA
Attorney General of California
NELI PALMA
Senior Assistant Attorney General
KATHLEEN BOERGERS
Supervising Deputy Attorney General
WILLIAM BELLAMY
MARIA F. BUXTON
KATHERINE MILTON
KEVIN G. REYES
STEPHANIE T. YU
ANNA RICH (State Bar No. 230195)
Deputy Attorneys General
1515 Clay Street Suite 2000, P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-0296
E-mail: Anna.Rich@doj.ca.gov
Attorneys for Plaintiff State of California
Additional Counsel Listed on Signature Page

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

**STATE OF CALIFORNIA; STATE OF ARIZONA;
STATE OF COLORADO; STATE OF
CONNECTICUT; STATE OF DELAWARE; STATE
OF HAWAII; STATE OF ILLINOIS; STATE OF
MAINE; STATE OF MARYLAND;
COMMONWEALTH OF MASSACHUSETTS; STATE
OF MICHIGAN; STATE OF MINNESOTA; STATE
OF NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF OREGON; STATE OF RHODE ISLAND; STATE
OF VERMONT; STATE OF WASHINGTON,**

Plaintiffs,

v.

**U.S. DEPARTMENT OF HEALTH AND HUMAN
SERVICES; ROBERT F. KENNEDY, JR.,** in his
official capacity as Secretary of the U.S.
Department of Health and Human Services; **U.S.
DEPARTMENT OF HOMELAND SECURITY;
KRISTI NOEM,** in her official capacity as
Secretary of Homeland Security,

Defendants.

3:25-cv-05536-VC

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

Date: August 28, 2025
Time: 10:00 a.m.
Courtroom: Courtroom 4
Judge: Hon. Vince Chhabria
Trial Date: Not set
Action Filed: July 1, 2025

NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that on August 28, 2025, at 10:00 a.m., Plaintiffs the States of Arizona, California, Colorado, Connecticut, Delaware, Hawai‘i, Illinois, Maine, Maryland, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, Oregon, Rhode Island, Vermont, Washington, and the Commonwealth of Massachusetts (collectively, Plaintiffs or the States) will and hereby do move this Court pursuant to Federal Rule of Civil Procedure 65 and Local Rule 7-2 for a preliminary injunction against Defendants U.S. Department of Health and Human Services (HHS); Robert F. Kennedy, Jr., in his official capacity as Secretary of HHS; U.S. Department of Homeland Security (DHS); and Kristi Noem, in her official capacity as Secretary of DHS; and their officers, agents, servants, employees, and any other persons who are in active concert or participation with them.

Plaintiffs respectfully move the Court to enter a preliminary injunction: (1) prohibiting Defendants from transferring the States’ Medicaid data files containing personally identifiable, protected health information to DHS, the Department of Government Efficiency (DOGE), or any other federal agency; (2) prohibiting Defendants from using such data for purposes of immigration enforcement, population surveillance, or other similar purposes; and (3) any additional preliminary relief that the Court deems proper and the interests of justice may require.

This motion is based on this notice, the Complaint for Declaratory and Injunctive Relief (ECF No. 1); the accompanying Memorandum of Points and Authorities;¹ the supporting declarations; this Court’s file; and any matters properly before the Court.

¹ The Plaintiffs’ Memorandum of Points and Authorities is submitted separately pending the Court’s Order granting Plaintiffs’ concurrently filed Motion to Exceed the Page Limitations.