

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA, et al.

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., et al.,

Defendants.

Civil Action No.: 25-cv-12019

**PLAINTIFF STATES' MOTION FOR A
PRELIMINARY INJUNCTION AND STAY**

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and 5 U.S.C. § 705, Plaintiffs hereby move this Court to preliminarily enjoin Defendants from implementing or enforcing the challenged provisions of the Final Rule entitled *Patient Protection and Affordable Care Act; Marketplace Integrity and Affordability*, 90 Fed. Reg. 27074 (June 25, 2025), and to stay the effective date of these same provisions, as against Plaintiffs, pending a final ruling on the merits of this case. The grounds for this motion are set forth in Plaintiffs' accompanying memorandum of law in support of their motion, and the challenged provisions are set forth in the proposed order attached as an exhibit to this motion.

July 17, 2025

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LOCAL RULE 7.1 CERTIFICATE

I certify that on July 17, 2025, at 11:46 a.m., I contacted Diane Kelleher, Director, Federal Programs Branch, U.S. Department of Justice (diane.kelleher@usdoj.gov), Rayford Farquhar, Chief, Defensive Litigation, Civil Division, U.S. Attorney's Office for the District of Massachusetts (rayford.farquhar@usdoj.gov), Abraham George (abraham.george@usdoj.gov), and Brad Rosenberg (brad.rosenberg@usdoj.gov) by email in an attempt to meet and confer regarding the foregoing request for relief. Eric Beckenhauer (Eric.Beckenhauer@usdoj.gov) responded on behalf of Defendants. Plaintiffs and Defendants have met and conferred in good faith and have been unable to resolve or narrow the subject of this Motion.

/s/ Allyson Slater

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CERTIFICATE OF SERVICE

I, Allyson Slater, certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

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