

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

HUNGER FREE AMERICA, INC.,
Plaintiff,

v.

BROOKE L. ROLLINS, et al.,
Defendants.

Case No. 1:25-cv-1815 (JEB)

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, and for the reasons set forth in the accompanying memorandum, Plaintiff hereby moves for a preliminary injunction to require Defendants to enter into a contract with a nongovernmental organization to establish and maintain an information clearinghouse of food assistance resources. Congress expressly instructed Defendant Brooke L. Rollins, Secretary of Agriculture, to enter such a contract, and Defendants violated that express command when they abruptly allowed the clearinghouse contract with Plaintiff Hunger Free America to lapse and took no action to enter a new contract with Plaintiff or any other nongovernmental organization.

Until this Court finally adjudicates the legality of that decision to terminate funding for the clearinghouse, Plaintiff seeks a preliminary injunction that would require Defendants to enter into a contract with a nongovernmental organization to establish and maintain the clearinghouse as required by statute.

At approximately 6 p.m. on June 20, 2025, counsel for Plaintiffs emailed the Director and Deputy Director for the Federal Programs Branch of the Department of Justice and the Chief of the Civil Division of the U.S. Attorney’s Office in D.C. to provide them with electronic copies of

the complaint, motion for a preliminary injunction, and accompanying memorandum, declaration, and proposed order via e-mail before completing this electronic filing.

Dated: June 20, 2025

Respectfully submitted,

/s/ Cormac A. Early

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