

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

State of Minnesota, by and through its
Attorney General Keith Ellison, and
Shireen Gandhi, in her official capacity as
the Commissioner of the Minnesota
Department of Human Services,

Civ. No.: 26-cv-1701

Plaintiffs,

vs.

Dr. Mehmet Oz, in his official capacity as
Administrator for the Centers for Medicare
and Medicaid Services; the Centers for
Medicare and Medicaid 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
Health and Human Services,

Defendants.

**PLAINTIFFS' MOTION
FOR TEMPORARY RESTRAINING
ORDER AND EXPEDITED
PRELIMINARY INJUNCTION**

Plaintiffs State of Minnesota, by and through its Attorney General Keith Ellison, and Shireen Gandhi, in her official capacity as the Commissioner of the Minnesota Department of Human Services, move the Court under Fed. R. Civ. P. 65 and D. Minn. L.R. 7.1(d), for a temporary restraining order and expedited preliminary injunction that prohibits and vacates Defendants Dr. Mehmet Oz, in his official capacity as Administrator for the Centers for Medicare and Medicaid Services; the Centers for Medicare and Medicaid Services; Robert F. Kennedy, Jr., in his official capacity as Secretary of the U.S. Department of Health and Human Services; and U.S. Department of Health and Human

Services, from immediately withholding \$243,790,260 from Plaintiffs as stated in Defendants' February 25, 2026 deferral notice.

Plaintiffs do not seek an *ex parte* temporary restraining order, and they do not object to Defendants responding before a hearing on the motion. Plaintiffs do, however, request an expedited handling of this matter, by Friday, March 6, 2026, due to the serious consequences of Defendants' actions. Plaintiffs ask the Court to set an appropriate briefing schedule based off that hearing date and request a ruling on their Motion as soon as possible.

Plaintiffs' motion is based on their submissions to the Court, including their memorandum of law in support of its motion, the supporting declarations, any forthcoming reply memorandum, arguments of counsel, and the other documents on record with the Court.

(Signature on next page)

Dated: March 2, 2026

KEITH ELLISON
Attorney General
State of Minnesota

s/ Scott Ikeda
NATE BRENNAMAN
Assistant Attorney General
Atty. Reg. No. 0331776

SCOTT H. IKEDA
Assistant Attorney General
Atty. Reg. No. 0386771

BRANDON BOESE
Assistant Attorney General
Atty. Reg. No. 0396385

EMILY DOYLE
Assistant Attorney General
Atty. Reg. No. 0403550

445 Minnesota Street, Suite 600
St. Paul, Minnesota 55101-2125
(651) 757-1112 (Voice)
(651) 282-5832 (Fax)
Nate.Brennaman@ag.state.mn.us
scott.ikeda@ag.state.mn.us
brandon.boese@ag.state.mn.us
Emily.Doyle@ag.state.mn.us

Attorneys For Plaintiffs

#6307103-v1