

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

STATE OF NEW YORK, *et al.*,

*Plaintiffs,*

v.

ADMINISTRATION FOR CHILDREN AND  
FAMILIES, *et al.*,

*Defendants.*

Case No. 1:26-cv-02726-JEB

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION  
AND STAY UNDER 5 U.S.C. § 705**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Local Civil Rule 65.1, and 5 U.S.C. § 705, Plaintiffs the State of New York, District of Columbia, State of California, State of Arizona, State of Colorado, State of Connecticut, State of Delaware, State of Hawai‘i, State of Illinois, Office of the Governor *ex rel.* Andy Beshear, in his official capacity as Governor of the Commonwealth of Kentucky, 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 Oregon, Josh Shapiro, in his official capacity as Governor of the Commonwealth of Pennsylvania, State of Rhode Island, State of Vermont, Commonwealth of Virginia, State of Washington, and State of Wisconsin (“Plaintiff States”) move for the following relief.

First, Plaintiffs move the Court to issue a stay of the effective date of the System of Records Notice (“SORN”) and Revision at issue in this case under 5 U.S.C. § 705, and a preliminary injunction prohibiting Defendants from implementing the SORN or Revision of the TANF System of Records as to Plaintiff States, including as to data reported to the Administration for Children and Families by Plaintiff States or verification information obtained from Plaintiff States.

Second, Plaintiff States respectfully request that the Court dispense with the security requirement referenced in Federal Rule of Civil Procedure 65(c), pursuant to its “broad discretion” to determine whether an injunction bond is appropriate. *Am. First Legal Found. v. Becerra*, No. 24-cv-1092, 2024 WL 3741402, at \*16 n.11 (D.D.C. Aug. 9, 2024). District courts can and should “dispense with any security requirement whatsoever” when, as here, “the restraint will do the defendant no material damage” and “there has been no proof of likelihood of harm.” *Id.* (quoting *Fed. Prescription Serv., Inc. v. Am. Pharm. Ass’n*, 636 F.2d 755, 759 (D.C. Cir. 1980)); *see also Nat’l Ass’n of Deaf v. Trump*, 808 F. Supp. 3d 150, 167 (D.D.C. 2025).

The grounds for this Motion are set forth in the attached memorandum of law and its supporting declarations and exhibits. A proposed order for a preliminary injunction and § 705 stay is attached hereto.

Dated: August 5, 2026

**LETITIA JAMES**

Attorney General for the State of New York

By: /s/ Jessica Ranucci

Jessica Ranucci

Mark Ladov

Stephen Thompson

*Special Counsel*

Rabia Muqaddam

*Chief Counsel for Federal Initiatives*

28 Liberty St.

New York, NY 10005

(929) 736-3392

jessica.ranucci@ag.ny.gov

mark.ladov@ag.ny.gov

stephen.thompson@ag.ny.gov

rabia.muqaddam@ag.ny.gov

*Counsel for the State of New York*

**ROB BONTA**

Attorney General of California

By: /s/ Camille Framroze

Todd Grabarsky

Matthew Wise

*Supervising Deputy Attorneys General*

William Bellamy

Camille Framroze

Harald Kirn

Andrew Kushner

*Deputy Attorneys General*

455 Golden Gate Ave., Ste. 11000

San Francisco, CA 94102-7004

(415) 510-3619

Camille.Framroze@doj.ca.gov

*Counsel for the State of California*

Respectfully submitted,

**BRIAN L. SCHWALB**

Attorney General for the District of Columbia

By: /s/ Mitchell P. Reich

Mitchell P. Reich (1044671)

*Senior Counsel to the Attorney General*

Karthik Reddy (1048848)

*Special Assistant Attorney General*

Office of the Attorney General for the District  
of Columbia

400 Sixth St. NW

Washington, DC 20001

(202) 279-1261

mitchell.reich@dc.gov

*Counsel for the District of Columbia*

**KRISTIN K. MAYES**

Attorney General for the State of Arizona

By: /s/ Luci D. Davis

Luci D. Davis

Jaylia Yan (90007649)

2005 N. Central Ave.

Phoenix, AZ 85004

(602) 542-3333

Luci.Davis@azag.gov

Jaylia.Yan@azag.gov

ACL@azag.gov

*Counsel for the State of Arizona*

**PHIL WEISER**

Attorney General of Colorado

By: /s/ David Moskowitz

David Moskowitz (994469)

*Deputy Solicitor General*

Reed W. Morgan

*Assistant Solicitor General*

1300 Broadway, 10th Fl.

Denver, CO 80203

(720) 508-6000

david.moskowitz@coag.gov

*Counsel for the State of Colorado*

**KATHLEEN JENNINGS**

Attorney General of the State of Delaware

By: /s/ Vanessa L. Kassab

Ian R. Lison

*Director of Impact Litigation*

Vanessa L. Kassab

*Deputy Attorney General*

Delaware Department of Justice

820 N. French St.

Wilmington, DE 19801

(302) 683-8899

vanessa.kassab@delaware.gov

*Counsel for the State of Delaware*

**KWAME RAOUL**

Attorney General of Illinois

By: /s/ Harpreet K. Khera

Harpreet K. Khera

*Bureau Chief, Special Litigation*

Sherief Gaber

*Assistant Attorney General*

115 S. LaSalle St., 35th Fl.

Chicago, IL 60603

(773) 590-7127

Harpreet.Khera@ilag.gov

Sherief.Gaber@ilag.gov

*Counsel for the State of Illinois*

**WILLIAM TONG**

Attorney General of Connecticut

By: /s/ Katherine Zdrojeski

Katherine Zdrojeski

*Assistant Attorney General*

165 Capitol Ave.

Hartford, CT 06106

(860) 808-5210

Katherine.Zdrojeski@ct.gov

*Counsel for the State of Connecticut*

**ANNE E. LOPEZ**

Attorney General for the State of Hawai'i

By: /s/ Kaliko 'onālani D. Fernandes

Kaliko 'onālani D. Fernandes

*Solicitor General*

425 Queen St.

Honolulu, HI 96813

(808) 586-1360

kaliko.d.fernandes@hawaii.gov

*Counsel for the State of Hawai'i*

**OFFICE OF THE GOVERNOR *ex rel.***

**ANDY BESHEAR**

In his official capacity as Governor of the

Commonwealth of Kentucky

By: /s/ S. Travis Mayo

S. Travis Mayo

*General Counsel*

Sam Flynn

*Chief Deputy General Counsel*

Laura C. Tipton

*Deputy General Counsel*

Office of the Governor

501 High St.

Frankfort, KY 40601

(502) 564-2611  
travis.mayo@ky.gov  
sam.flynn@ky.gov  
laurac.tipton@ky.gov

*Counsel for the Office of the Governor*

**AARON M. FREY**  
Attorney General for the State of Maine

By: /s/ Brendan Kreckel  
Brendan Kreckel  
Assistant Attorney General  
Office of the Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
(207) 626-8800  
brendan.kreckel@maine.gov

*Counsel for the State of Maine*

**ANDREA JOY CAMPBELL**  
Attorney General of Massachusetts

By: /s/ Michelle Pascucci  
Michelle Pascucci  
State Trial Counsel  
Jak Kundl  
Assistant Attorney General  
One Ashburton Pl.  
Boston, MA 02108  
(617) 963-2255  
michelle.pascucci@mass.gov  
jak.kundl@mass.gov

*Counsel for the Commonwealth of  
Massachusetts*

**ANTHONY G. BROWN**  
Attorney General of Maryland

By: /s/ Keith M. Jamieson  
Keith M. Jamieson (187911)  
Assistant Attorney General  
Office of the Attorney General  
200 Saint Paul Place  
Baltimore, MD 21202  
(410) 576-6960  
kjamieson@oag.maryland.gov

*Counsel for the State of Maryland*

**DANA NESSEL**  
Attorney General of Michigan

By: /s/ Neil Giovanatti  
Neil Giovanatti  
Assistant Attorney General  
Michigan Department of Attorney General  
525 W. Ottawa St.  
Lansing, MI 48909  
(517) 335-7603  
GiovanattiN@michigan.gov

*Counsel for the State of Michigan*

**KEITH ELLISON**

Attorney General of the State of Minnesota

By: /s/ Lindsey E. Middlecamp

Lindsey E. Middlecamp  
Special Counsel, Rule of Law  
445 Minnesota St., Suite 600  
St. Paul, MN 55101  
(651) 300-0711  
lindsey.middlecamp@ag.state.mn.us

*Counsel for the State of Minnesota*

**JENNIFER DAVENPORT**

Attorney General of New Jersey

By: /s/ Kashif T. Chand

Kashif T. Chand  
Assistant Attorney General  
New Jersey Office of the Attorney General,  
Division of Law  
124 Halsey St., 5th Fl.  
Newark, NJ 07101  
(973) 648-2052  
Kashif.Chand@law.njoag.gov

*Counsel for the State of New Jersey*

**DAN RAYFIELD**

Attorney General State of Oregon

By: /s/ Leanne Hartmann

Leanne Hartmann  
Senior Assistant Attorney General  
Oregon Department of Justice  
100 SW Market St.  
Portland, OR 97201  
(971) 673-1880  
Leanne.Hartmann@doj.oregon.gov

*Counsel for the State of Oregon*

**AARON D. FORD**

Attorney General of the State of Nevada

By: /s/ K. Brunetti Ireland

K. Brunetti Ireland  
Chief of Special Litigation  
Office of the Nevada Attorney General  
1 State of Nevada Way, Ste. 100  
Las Vegas, NV 89119  
(702) 486-3420  
kireland@ag.nv.gov

*Counsel for the State of Nevada*

**RAÚL TORREZ**

Attorney General for the State of New Mexico

By: /s/ Anjana Samant

Anjana Samant  
Deputy Counsel  
New Mexico Department of Justice  
408 Galisteo St.  
Santa Fe, NM 87501  
(505) 270-4332  
asamant@nm DOJ.gov

*Counsel for the State of New Mexico*

**JOSH SHAPIRO**

In his official capacity as Governor of the Commonwealth of Pennsylvania

By: /s/ Jacob B. Boyer

Jennifer C. Selber  
Jacob B. Boyer  
Governor's Office of General Counsel  
30 North 3rd St.  
Suite 200  
Harrisburg, PA 17101  
(717) 831-2847  
jacobboyer@pa.gov

*Counsel for Governor Josh Shapiro*

**PETER F. NERONHA**

Attorney General of Rhode Island

By: /s/ Marissa D. Pizaña

Marissa D. Pizaña

*Special Assistant Attorney General*

150 South Main St.

Providence, RI 02903

(401) 274-4400

MPizana@riag.ri.gov

*Counsel for the State of Rhode Island*

**JAY JONES**

Attorney General for the Commonwealth of Virginia

By: /s/ Megan C. Keenan

Megan C. Keenan (1672508)

*Deputy Solicitor General*

202 North Ninth St.

Richmond, VA 23219

(804) 997-5222

mkeenan@oag.state.va.us

*Counsel for the Commonwealth of Virginia*

**JOSHUA L. KAUL**

Attorney General of the State of Wisconsin

By: /s/ Faye B. Hipsman

Faye B. Hipsman

*Assistant Attorney General*

Wisconsin Department of Justice

PO Box 7857

Madison, WI 53707-7857

(608) 264-9487

faye.hipsman@wisdoj.gov

*Counsel for the State of Wisconsin*

**CHARITY R. CLARK**

Attorney General for the State of Vermont

By: /s/ Ryan Patrick Kane

Ryan Patrick Kane

*Deputy Solicitor General*

109 State St.

Montpelier, VT 05609

(802) 828-3171

Ryan.kane@vermont.gov

*Counsel for the State of Vermont*

**NICHOLAS W. BROWN**

Attorney General of the State of Washington

By: /s/ Mina Shahin

Mina Shahin

*Assistant Attorney General*

William McGinty

*Deputy Solicitor General*

800 Fifth Ave., Ste. 2000

Seattle, WA 98104

(206) 464-7744

Mina.Shahin@atg.wa.gov

William.McGinty@atg.wa.gov

*Counsel for the State of Washington*