

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

STATE OF CALIFORNIA;  
COMMONWEALTH OF  
MASSACHUSETTS; STATE OF NEW  
JERSEY; STATE OF COLORADO; STATE  
OF ILLINOIS; STATE OF MARYLAND;  
STATE OF NEW YORK; and STATE OF  
WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION;  
DENISE CARTER, in her official capacity  
as former Acting Secretary of Education and  
current acting Chief Operating Officer,  
Federal Student Aid; LINDA MCMAHON,  
in her official capacity as Secretary of  
Education,

Defendants.

Case No. 1:25-cv-10548

**PLAINTIFF STATES' MOTION TO EXTEND TEMPORARY RESTRAINING ORDER**

The Temporary Restraining Order (“TRO”) entered by the Court on March 10, 2025, is currently set to expire on March 24, 2025. The hearing on Plaintiff States’ motion for a preliminary injunction is scheduled for March 28, 2025. Plaintiff States respectfully request that this Court extend for good cause the duration of the TRO for seven days, up to and including March 31, 2025, to allow the Court time to rule on the preliminary injunction motion before the TRO expires. *See, e.g., Almeida-Leon v. WM Cap. Mgmt., Inc.*, No. 20-2089, 2024 WL 2904077, at \*5 (1st Cir. June 10, 2024); Fed. R. Civ. P. 65(b)(2) (permitting extension of 14-day period for good cause). Should the Court require more time to rule on the preliminary injunction motion, Plaintiff States request that it extend the duration of the TRO until the date of the Court’s order

on that motion—but no later than April 7, 2025, fourteen days beyond the current expiration date for the TRO as contemplated by Federal Rule of Civil Procedure 65(b)(2).

Good cause exists due to the complexity of the suit, the number of parties involved, the intense and wide-reaching harm to Plaintiffs caused in the absence of injunctive relief, and the expedited schedule already ordered by the Court to reach a determination on a preliminary injunction in the near future. Specifically, the Court has already implemented an accelerated briefing schedule, converting Plaintiffs’ Motion for a Temporary Restraining Order into a Motion for a Preliminary Injunction and issuing deadlines of March 17, 2025, for Defendants’ Opposition, and March 21, 2025, for Plaintiffs’ Reply, with a hearing on March 28, 2025. *See* Doc. No. 52. Extending the TRO for seven days, or until the court issues a ruling on the preliminary injunction motion—but no later than fourteen days beyond the current expiration date—would maintain the status quo while this matter is expeditiously litigated, thereby obviating the “substantial risk that the States and its citizens will face a significant disruption in health, education, and other public services that are integral to their daily lives” that would occur should the TRO lapse before the Court resolves the motion for a preliminary injunction. Doc. No. 41 at 9 (internal quotation omitted).

WHEREFORE, Plaintiff States respectfully request that the Court extend the TRO for seven days, up to and including March 31, 2025, or until the Court issues a decision on Plaintiff’s Motion for a Preliminary Injunction, but no later than April 7, 2025, in accordance with the fourteen day extension for good cause contemplated under Rule 65(b)(2).

Dated: March 21, 2025

Respectfully submitted,

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†motion for admission *pro hac vice* forthcoming

**LOCAL RULE 7.1 CERTIFICATE**

I, Adelaide Pagano, certify that on March 21, 2025, at 2:18 pm, I contacted counsel for Defendants by electronic mail to provide notice of this motion. Counsel acknowledged receipt.

/s/ Adelaide Pagano  
Adelaide Pagano (BBO #690518)  
*Assistant Attorney General*

Dated: March 21, 2025

**CERTIFICATE OF SERVICE**

I, Adelaide Pagano, 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:

/s/ Adelaide Pagano  
Adelaide Pagano (BBO #690518)  
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Dated: March 21, 2025