

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

STATE OF MARYLAND, *et al.*,

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Plaintiffs,

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v.

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CIVIL NO. JKB-25-0748

UNITED STATES DEPARTMENT OF  
AGRICULTURE, *et al.*,

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Defendants.

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**MEMORANDUM AND ORDER**

Pending before the Court is Plaintiff States’ Motion to Extend Temporary Restraining Order. (ECF No. 85.) The Court entered a Temporary Restraining Order (“TRO”) in this case on March 13, 2025, which had been set to expire on Thursday, March 27, 2025, at 8:00 p.m. EDT. (ECF No. 44.) As described below, the Court concludes that there is good cause to extend the TRO for a brief period. The TRO will be extended to Tuesday, April 1, 2025, at 8:00 p.m. EDT.

Federal Rule of Civil Procedure 65(b)(2) provides that a TRO “expires at the time after entry—not to exceed 14 days—that the court sets, unless before that time the court, for good cause, extends it for a like period or the adverse party consents to a longer extension. The reasons for an extension must be entered in the record.”

Although there is little case law on what constitutes “good cause,” “a showing that the grounds for originally granting the [TRO] continue to exist” is sufficient, Wright & Miller, 11A Fed. Prac. & Proc. Civ. § 2953 (3d ed. Apr. 2020 Update), and courts have also found “good cause” where more time is needed fully to consider the parties’ arguments and motions or “where the moving party need[s] additional time to prepare and present its preliminary injunction,” *SEC v. Arisebank*, Civ. No. 18-186, 2018 WL 10419828 at \*1 (N.D. Tex. Mar. 9, 2018) (collecting cases).

*Costa v. Bazron*, Civ. No. RDM-19-3185, 2020 WL 2410502, at \*2 (D.D.C. May 11, 2020).

The Court concludes that there is good cause for a brief, five-day extension of the TRO. On March 20, 2025, Plaintiff States filed a Motion for a Section 705 Stay and Preliminary Injunction (“Preliminary Injunction Motion”). (ECF No. 78.) The Government filed its Response in Opposition on March 24, 2025. (ECF No. 101.) The Court held a Hearing on the Preliminary Injunction Motion today, March 26, 2025. During the Hearing, it became apparent that there were important issues that had not been fully addressed in the parties’ briefs, and accordingly the Court ordered—and the parties agreed to submit—additional briefing, due tomorrow, March 27, 2025. The Court appreciate the parties’ speed in submitting these and prior presentations, and the Court is working diligently to resolve this matter as expeditiously as possible. That said, given the complex issues presented by this case and the condensed timing of argument and briefing, the Court requires time to fully consider the parties’ positions and to prepare its memorandum and accompanying order. It is the Court’s expectation that it will issue its ruling on the Preliminary Injunction Motion within this five-day time period.

Accordingly, it is ORDERED that:

1. Plaintiff States’ Motion to Extend Temporary Restraining Order (ECF No. 85) is GRANTED.
2. For good cause found, the TRO (ECF No. 44) is EXTENDED for five additional days, and SHALL EXPIRE on Tuesday, April 1, 2025, at 8:00 p.m. EDT.

DATED this 26 day of March, 2025.

BY THE COURT:



James K. Bredar  
United States District Judge