

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NAMOD PALLEK, *et al.*

Plaintiffs,

v.

Civil Action No. 1:25-cv-01650-JMC

BROOKE L. ROLLINS, in her official
capacity as U.S. Secretary of Agriculture, *et al.*

Defendants.

**PLAINTIFFS' RENEWED MOTION FOR A TEMPORARY RESTRAINING ORDER
AND/OR FOR POSTPONEMENT UNDER 5 U.S.C. § 705**

Pursuant to Local Civil Rule 65.1(a) and 5 U.S.C. § 705, Plaintiffs Namod Pallek, Julliana Samson, Diana Ramos, Catherine Hollingsworth, MAZON, Inc.: A Jewish Response to Hunger (“MAZON”), and Electronic Privacy Information Center (“EPIC”) hereby request that this Court “postpone the effective date” of Defendants’ July 9, 2025 Letter, Dkt. 28-2 (the “Renewed Data Demand,” *see* First Am. Compl., Dkt. 27, ¶ 83), and issue a Temporary Restraining Order enjoining Defendants U.S. Secretary of Agriculture Brooke L. Rollins, the U.S. Department of Agriculture (“USDA”), Administrator of the Food and Nutrition Service James C. Miller, and the Food and Nutrition Service (“FNS”), from retrieving any Supplemental Nutrition Assistance Program (“SNAP”) applicant and recipient information from state governments or third-party EBT processors. Plaintiffs request that this order remain in effect until such time as the Court can further consider the merits of Plaintiffs’ claims.

As set forth in more detail in the accompanying memorandum, Defendants have demanded information about individuals applying for or receiving SNAP in violation of the Privacy Act of 1974, the Paperwork Reduction Act of 1980, and the Administrative Procedure Act. Plaintiffs will suffer imminent and irreparable injury should Defendants be allowed to effectuate the Renewed Data Demand from July 24 through July 30, 2025, as Defendants have declared their intent to do.

Accordingly, the Court should issue a temporary restraining order:

- (1) Postponing the effective date of the Renewed Data Demand until the conclusion of this case.
- (2) Enjoining Defendants and their officers, agents, servants, employees, and attorneys from:
 - a. enforcing the Renewed Data Demand;
 - b. demanding, seeking, or otherwise requesting any SNAP applicant and recipient information from state governments or third-party EBT processors pursuant to the Renewed Data Demand; *and*
 - c. receiving, collecting, or otherwise taking possession of any SNAP applicant and recipient information from state governments or third-party EBT processors pursuant to the Renewed Data Demand.
- (3) Directing Defendants and their officers, agents, servants, employees, and attorneys to immediately direct states and third-party EBT processors not to comply with the Renewed Data Demand.
- (4) Ordering Defendants to file a status report with this Court by an appropriate date identified by the Court:

- documenting the actions they have taken to comply with this Order; *and*
- certifying compliance with the temporary restraining order.

Pursuant to Local Civil Rule 65.1(a), undersigned counsel affirms that copies of this motion and all supporting documentation were provided via the Court's ECF/CM system upon filing.

Date: July 17, 2025

Deana El-Mallawany*
PROTECT DEMOCRACY PROJECT
15 Main Street, Suite 312
Watertown, MA 02472
(202) 579-4582
deana.elmallawany@protectdemocracy.org

Nicole Schneidman*
PROTECT DEMOCRACY PROJECT
P.O. Box 341423
Los Angeles, CA 90034-9998
(202) 579-4582
nicole.schneidman@protectdemocracy.org

JoAnna Suriani (D.C. Bar No. 1645212)*
PROTECT DEMOCRACY PROJECT
2020 Pennsylvania Ave. NW, Suite # 163
Washington, DC 20006
(202) 579-4582
joanna.suriani@protectdemocracy.org

*Counsel for Plaintiffs MAZON, EPIC, Ramos
& Hollingsworth*

Saima A. Akhtar (NY Bar No. 4661237)*

Respectfully submitted,

/s/ Daniel A. Zibel
Daniel A. Zibel (D.C. Bar No. 491377)
Madeline Wiseman (D.C. Bar No. 90031948)
Melissa Padilla (D.C. Bar No. 90018065)
NATIONAL STUDENT LEGAL DEFENSE
NETWORK
1701 Rhode Island Ave. NW
Washington, DC 20036
(202) 734-7495
Email: dan@defendstudents.org
madeline@defendstudents.org
melissa@defendstudents.org

Counsel for Plaintiffs

John L. Davisson, D.C. Bar #1531914
Sara Geoghegan, D.C. Bar #90007340
Kabbas Azhar, D.C. Bar #90027866
ELECTRONIC PRIVACY
INFORMATION CENTER
1519 New Hampshire Ave, N.W.
Washington, D.C. 20036
Telephone: (202) 483-1140
Fax: (202) 483-1248
Email: davisson@epic.org
geoghegan@epic.org
azhar@epic.org

NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE

50 Broadway, Suite 1500

New York, NY 10004

(212) 633-6967 (telephone)

(212) 633-6371 (fax)

Email: akhtar@nclej.org

Counsel for EPIC

* Admitted *Pro Hac Vice*

*Counsel for Plaintiffs MAZON, EPIC, Ramos
& Hollingsworth*