

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

COMMONWEALTH OF MASSACHUSETTS; STATE OF CALIFORNIA; STATE OF ARIZONA; STATE OF MINNESOTA; STATE OF CONNECTICUT; STATE OF COLORADO; STATE OF DELAWARE; DISTRICT OF COLUMBIA; STATE OF HAWAI‘I; STATE OF ILLINOIS; LAURA KELLY, in her official capacity as Governor of the State of Kansas; 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; STATE OF MICHIGAN; STATE OF NEVADA; STATE OF NEW JERSEY; STATE OF NEW MEXICO; STATE OF NEW YORK; STATE OF NORTH CAROLINA; STATE OF OREGON; JOSH SHAPIRO, in his official capacity as Governor of the Commonwealth of Pennsylvania; STATE OF RHODE ISLAND; STATE OF VERMONT; STATE OF WASHINGTON; and STATE OF WISCONSIN,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF AGRICULTURE; BROOKE ROLLINS, in her official capacity as U.S. Secretary of Agriculture; U.S. OFFICE OF MANAGEMENT AND BUDGET; RUSSELL VOUGHT, in his official capacity as Director of the U.S. Office of Management and Budget; and UNITED STATES OF AMERICA,

Defendants.

Case No. 1:25-cv-13165

[PROPOSED] TEMPORARY RESTRAINING ORDER

This matter comes before the Court on the Motion for a Temporary Restraining Order of Plaintiffs.¹ Having reviewed Plaintiffs’ Complaint, Motion, Memorandum of Law, Declarations

¹ Commonwealth of Massachusetts; State of California; State of Arizona; State of Minnesota; State of Connecticut; State of Colorado; State of Delaware; District of Columbia; State of Hawai‘i; State of Illinois; Laura Kelly, in her official capacity as Governor of the State of Kansas; 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; State of Michigan; State of Nevada; State of New Jersey; State of New Mexico; State of New York; State of North Carolina; State of Oregon; Josh Shapiro, in his official capacity as Governor of the Commonwealth of Pennsylvania; State of Rhode Island; State of Vermont; State of Washington; and State of Wisconsin.

and evidence in support of the Motion, as well as any papers filed in opposition to this Motion, and in accordance with Federal Rule of Civil Procedure 65, and for good cause shown, the Court finds that Plaintiffs have satisfied the requirements for the issuance of a temporary restraining order because: (1) Plaintiffs have established a substantial likelihood of success on the merits; (2) Plaintiffs will be irreparably harmed absent a temporary restraining order; and (3) the public interest and balance of the equities strongly favor entry of a temporary restraining order.

It is therefore ORDERED that:

- i. Defendants are temporarily enjoined from:
 - a. implementing, giving effect to, maintaining, or reinstating under a different name the directives in the October 10, 2025 Letter (“Supplemental Nutrition Assistance Program (SNAP) Benefit and Administrative Expense Update for November 2025”) or the October 24, 2025 Letter (“Supplemental Nutrition Assistance Program (SNAP) Benefit and Administrative Expense Update for November 2025”) as to Plaintiffs or as to the SNAP benefits administered by the Plaintiffs;
 - b. enforcing the directives in the October 10 or October 24 Letters against Plaintiffs, including by seeking penalties under 7 C.F.R. § 271.7(h) or initiating noncompliance proceedings under 7 U.S.C. § 2020(g).
- ii. Defendants must immediately take every step necessary to effectuate this Order, including clearing any administrative, operational, or technical hurdles to implementation, including but not limited to requesting or effectuating any necessary apportionment of these funds by the U.S. Office of Management and Budget or any submission or approval of an updated U.S. Department of Agriculture lapse plan.

- iii. Defendants shall file a status report with the Court within 24 hours of entry of this Order confirming their compliance with this Order.
- iv. Defendants shall provide notice of this Order within 24 hours of entry to all Defendants, their employees and anyone acting in concert with them.
- v. This Order shall become effective immediately upon entry by this Court. It shall remain in effect until further order of this Court.

SO ORDERED.

Dated: _____

The Honorable Indira Talwani
United States District Judge