

Nationwide Injunctions from January 20, 2025, Through March 27, 2025

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In recent years, litigation over actions of the federal executive branch has prompted discussion of the authority of federal courts to halt or prevent the enforcement of executive branch policies. One particular focus of this discussion is *nationwide injunctions*—injunctions against the government that prevent the government from implementing a challenged law, regulation, or other policy against all relevant persons and entities, whether or not such persons or entities are parties participating in the litigation.

Several sources provide counts of nationwide injunctions. As of February 2020, the Department of Justice had identified 12 nationwide injunctions issued during the presidency of George W. Bush, 19 issued during Barack Obama’s presidency, and 55 such injunctions issued during the first Trump Administration up to that point. In April 2024, the *Harvard Law Review* published an article with counts of nationwide injunctions through 2023. With respect to the four most recent presidential Administrations, the article identified six nationwide injunctions issued under the George W. Bush Administration, 12 under the Obama Administration, 64 under the first Trump Administration, and 14 from the first three years of the Biden Administration. A March 2025 CRS report identified 86 nationwide injunction cases from the first Trump Administration and 28 from the Biden Administration.

This CRS report identifies nationwide injunctions issued during the second Trump Administration between January 20, 2025, and March 27, 2025. For several reasons, it is not possible to provide a single definitive count of nationwide injunctions. Most significantly, *nationwide injunction* is not a legal term with a precise definition, so counts may vary based on the particular definition used. In addition, there are practical challenges in searching for all nationwide injunction cases as well as methodological choices about how to count the injunctions that fit any given definition. This report explains CRS’s methodology for identifying nationwide injunction cases and includes a table listing 17 cases identified using that methodology.

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Several sources provide counts of nationwide injunctions. In a May 2019 address, then-Attorney General William Barr stated that federal courts “issued only 27 nationwide injunctions in all of the 20th century.”⁵ By contrast, as of February 2020, the Department of Justice had identified 12 nationwide injunctions issued during the presidency of George W. Bush, 19 issued during Barack Obama’s presidency, and 55 such injunctions issued during the first Trump Administration up to that point.⁶ In April 2024, the *Harvard Law Review* published an article with counts of nationwide injunctions through 2023.⁷ With respect to the four most recent presidential Administrations, the article identified six nationwide injunctions issued under the George W. Bush Administration, 12 under the Obama Administration, 64 under the first Trump Administration, and 14 from the first three years of the Biden Administration.⁸ A March 2025 CRS report identified 86 nationwide injunction cases from the first Trump Administration and 28 from the Biden Administration.⁹

This CRS report identifies nationwide injunctions issued during the second Trump Administration between January 20, 2025, and March 27, 2025.

¹ For additional discussion of the legal and policy debate around nationwide injunctions, see CRS Report R46902, *Nationwide Injunctions: Law, History, and Proposals for Reform*, by Joanna R. Lampe (2021).

² See *id.*

³ See, e.g., Application for Partial Stay of Injunction, *Trump v. CASA, Inc.*, No. 24A884 (Mar. 13, 2025); Application to Stay PI, *U.S. Off. of Personnel Mgmt v. Am. Fed’n of Gov’t Emps., AFL-CIO*, No. 24A904 (Mar. 24, 2025).

⁴ See, e.g., Emily Brooks, *House GOP Looks to Rein in Judicial Power Amid Calls for Impeachment*, THE HILL (Mar. 25, 2025), <https://thehill.com/homenews/house/5211685-house-republicans-federal-judges/>. For additional discussion of proposed reforms related to nationwide injunctions, see the “Key Proposals and Legal Considerations” section of CRS Report R46902, *Nationwide Injunctions: Law, History, and Proposals for Reform*, by Joanna R. Lampe (2021).

⁵ William P. Barr, Attorney General, Remarks to the American Law Institute on Nationwide Injunctions (May 21, 2019).

⁶ Jeffrey A. Rosen, Deputy Attorney General, Address at the Administrative Conference of the United States Forum on Nationwide Injunctions and Federal Regulatory Programs (Feb. 12, 2020).

⁷ *District Court Reform: Nationwide Injunctions*, 137 HARV. L. REV. 1701 (2024).

⁸ *Id.* at 1705. The *Harvard Law Review* article classified nationwide injunctions based on the President whose administration issued the challenged government action. See *id.*

⁹ CRS Report R48467, *Nationwide Injunctions Under the First Trump Administration and the Biden Administration*, by Joanna R. Lampe and Laura Deal (2025). CRS classified nationwide injunctions based on the President who was in office at the time each court order was issued. See *id.*, “Counting Nationwide Injunctions.” The reasons for the changes in frequency of nationwide injunctions over time are unclear. See *id.*, “Number of Nationwide Injunctions.”

Background and Methodology

An *injunction* is a form of equitable relief¹⁰ by which a court either requires an entity to take a certain action or forbids an entity from taking a certain action.¹¹ A *nationwide injunction* is generally defined as an injunction *against the government* that prevents the government from implementing a challenged law, regulation, or other policy against *all relevant persons and entities*, whether or not such persons or entities are parties participating in the litigation.¹² A March 2025 CRS report identifies and analyzes nationwide injunctions issued during the first Trump Administration and the Biden Administration.¹³ As discussed in more detail in that report, there are several reasons why it is not possible to provide a single definitive count of nationwide injunctions. Most significantly, *nationwide injunction* is not a legal term with a precise definition, so counts may vary based on the particular definition used.¹⁴ In addition, there are practical challenges in searching for all nationwide injunction cases¹⁵ and methodological choices about how to count the injunctions that fit any given definition.¹⁶

For purposes of this report, CRS:

- included only injunctions issued by federal courts;
- included only injunctions against the federal government or federal officials, not injunctions that bind states, state officials, or private parties;
- excluded class actions certified at or before the time of the injunction's issuance;¹⁷
- excluded injunctions that combine with one or more other injunctions to block a government action in its entirety but that, standing alone, do not do so;

¹⁰ Equitable relief is a court-ordered remedy providing relief other than money damages. *Equitable Remedy*, BLACK'S LAW DICTIONARY ("A remedy, usu. a nonmonetary one such as an injunction or specific performance, obtained when available legal remedies, usu. monetary damages, cannot adequately redress the injury.").

¹¹ *Injunction*, BLACK'S LAW DICTIONARY ("A court order commanding or preventing an action."). Courts may issue different forms of injunctive relief depending on the circumstances of the case and the status of litigation, including temporary restraining orders (TROs), preliminary injunctions (PIs), injunctions pending appeal, and permanent injunctions. All of those forms of injunctive relief are included in this report to the extent they meet the criteria for a nationwide injunction.

¹² *E.g.*, Amanda Frost, *In Defense of Nationwide Injunctions*, 93 N.Y.U. L. REV. 1065, 1071 (2018) (defining "nationwide injunction" to refer to "an injunction at any stage of the litigation that bars the defendant from taking action against individuals who are not parties to the lawsuit in a case that is not brought as a class action"); *Chicago v. Barr*, 961 F.3d 882, 912 (7th Cir. 2020) (defining "nationwide, or universal, injunctions" as "injunctive relief that extends beyond the parties before the court to include third parties"); *Dep't of Homeland Sec. v. New York*, 140 S. Ct. 599, 600 (2020) (Gorsuch, J., concurring) (defining the term to mean "a court ... ordering the government to take (or not take) some action with respect to those who are strangers to the suit").

¹³ CRS Report R48467, *Nationwide Injunctions Under the First Trump Administration and the Biden Administration*, by Joanna R. Lampe and Laura Deal (2025).

¹⁴ *See id.*, "Defining *Nationwide Injunction*."

¹⁵ *See id.*, "Searching for Nationwide Injunctions."

¹⁶ *See id.*, "Counting Nationwide Injunctions."

¹⁷ *See, e.g.*, *J.G.G. v. Trump*, No. 1:25-cv-00766, 2025 WL 825115 (D.D.C. Mar. 15, 2025) (provisionally certifying a class consisting of "All noncitizens in U.S. custody who are subject to the March 15, 2025, Presidential Proclamation entitled 'Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua' and its implementation" and enjoining the government from removing members of such class).

- excluded injunctions that block a government action in its entirety with the exception of limited carveouts to defer to other courts;¹⁸
- included all forms of injunctive relief that bar the government from enforcing a policy, such as temporary restraining orders (TROs), preliminary injunctions (PIs), injunctions pending appeal, and permanent injunctions;¹⁹ and
- excluded stays and vacatur of agency actions unless the agencies were also expressly enjoined from implementing the stayed or vacated actions.²⁰

To compile the table of cases in this report, CRS searched federal cases in Westlaw for the search terms (“nationwide” OR “nation-wide”) w/3 injunction) for the date range January 20, 2025, through March 27, 2025. CRS then manually reviewed results to find cases that fit the criteria outlined above. In addition, CRS reviewed news reports about nationwide injunctions and third-party websites tracking litigation against actions of the second Trump Administration²¹ and included cases that fit the criteria above but did not show up in the Westlaw search. Due to the lack of standardization in nationwide injunction cases, it is possible that there are other cases that fit this report’s criteria for inclusion but were not identified via CRS’s methodology. Moreover, because litigation related to implementation of executive branch policies is rapidly developing, courts could have issued additional nationwide injunctions after CRS completed its searches.

For purposes of this report, CRS counted nationwide injunctions by case. Each case (or set of consolidated cases) in which at least one nationwide injunction was issued by a federal court at any level is included as a single entry in the table. Some federal government actions were subject to nationwide injunctions in multiple cases and thus are included in the table more than once.

¹⁸ One district court issued an order during the relevant time period enjoining the government defendants “from enforcing the [challenged] Executive Order in any manner with respect to the plaintiffs, and *with respect to any individual or entity in any other matter or instance within the jurisdiction of this court*, during the pendency of this litigation.” N.H. Indonesian Cmty. Support v. Trump, No. 25-cv-38-JL-TSM, 2025 WL 457609 (D.N.H. Feb. 11, 2025) (emphasis added). It is not clear whether that order is intended to be limited in geographic scope but, because the order does not expressly bar enforcement universally, the case is not included in the table.

¹⁹ As of the date of this report, CRS has not identified any nationwide injunctions pending appeal or nationwide permanent injunctions issued during the second Trump Administration. In one decision issued during the relevant date range, a federal appeals court affirmed a district court’s nationwide injunction and remanded with instructions to broaden the injunction. Missouri v. Trump, 128 F.4th 979 (8th Cir. 2025). Because that decision involves appellate review of a nationwide injunction originally issued under the Biden Administration, it is not included in the table in this report.

²⁰ In addition to stays pending judicial review of agency action under the Administrative Procedure Act (APA), courts sometimes enter administrative stays to pause initiatives temporarily in time-sensitive emergency litigation. See, e.g., Dellinger v. Bessent, No. 25-cv-00385, 2025 WL 450488 (D.D.C. Feb. 10, 2025) (“An administrative stay ‘buys the court time to deliberate’: it ‘do[es] not typically reflect the court’s consideration of the merits,’ but instead ‘reflects a first-blush judgment about the relative consequences’ of the case. While administrative stays are more common in appellate courts, district courts have recognized their applicability in cases seeking emergency relief[.]”) (citing United States v. Texas, 144 S. Ct. 797, 798 (2024) (Barrett, J., concurring) (internal citation omitted)). Administrative stays are not included in this report’s count of nationwide injunctions. In one of the cases included in the table, the district court entered an administrative stay before entering a TRO. Nat’l Council of Nonprofits v. Off. of Mgmt. & Budget, No. 25-239, 2025 WL 314433 (D.D.C. Jan. 28, 2025). That case is listed in the table based on the date of entry of the TRO.

²¹ Just Security, *Litigation Tracker: Legal Challenges to Trump Administration Actions*, <https://www.justsecurity.org/107087/tracker-litigation-legal-challenges-trump-administration/> (last visited Mar. 27, 2025); Law360, *Trump’s Legal Battles*, <https://www.law360.com/trump-legal-challenges> (last visited Mar. 27, 2025); Bloomberg Law, *Tracking Trump in Court: The Scope of Executive Power Tested*, <https://news.bloomberglaw.com/litigation/tracking-trump-in-court-the-scope-of-executive-power-tested-1> (last visited Mar. 27, 2025).

Using the foregoing methodology, and subject to the noted caveats, CRS has identified 17 cases in which federal courts issued nationwide injunctions between January 20, 2025, and March 27, 2025.

Table of Cases

The following table contains a list of nationwide injunctions issued during the second Trump Administration between January 20, 2025, and March 27, 2025. The Caption column in the table contains a citation to the first nationwide injunction that CRS identified in each case. Cases are listed in chronological order based on the date of issuance of the first decision cited. The Main Topic column identifies the subject matter at issue in each case. CRS categorized cases by subject matter manually. While some cases raised multiple legal and policy issues and could potentially be classified in multiple subject areas, CRS selected one primary issue area per case for ease of analysis.

Any additional nationwide injunctions that issued in each case are included in the Notes column. The Notes column also briefly identifies the government action subject to each nationwide injunction. In some cases, only a part of an executive order, guidance document, or other federal initiative was enjoined, but in each case enforcement of the enjoined portion of the challenged action was barred as to all relevant persons or entities.

The government has filed appeals in many of the listed cases. As of the date of this report, no appellate court has ruled on the validity of any of the listed nationwide injunctions. Other than noting additional nationwide injunctions in each case, the table does not include subsequent history, such as clarifying orders or stays issued by the district court or a reviewing appellate court.

Table I. Nationwide Injunctions Between January 20, 2025, and March 27, 2025

	Caption	Main Topic	Notes
1	Washington v. Trump, No. C25-0127-JCC, 2025 WL 272198 (W.D. Wash. Jan. 23, 2025)	Birthright Citizenship	Temporary restraining order (TRO) against Exec. Order No. 14,160, Protecting the Meaning and Value of American Citizenship; preliminary injunction (PI) entered 2025 WL 415165 (W.D. Wash. Feb. 6, 2025)
2	Nat'l Council of Nonprofits v. Off. of Mgmt. & Budget, No. 25-239, 2025 WL 368852 (D.D.C. Feb. 3, 2025)	Federal Funding	TRO against Office of Management and Budget memorandum directing federal agencies to pause "financial assistance for foreign aid, nongovernmental organizations, [Diversity, Equity, and Inclusion (DEI)], woke gender ideology, and the green new deal"; PI entered 2025 WL 597959 (D.D.C. Feb. 25, 2025) ²²
3	CASA, Inc. v. Trump, No. DLB-25-201, 2025 WL 408636 (D. Md. Feb. 5, 2025)	Birthright Citizenship	TRO against Exec. Order No. 14,160, Protecting the Meaning and Value of American Citizenship

²² Before entering a TRO in this case, the district court entered an administrative stay. Nat'l Council of Nonprofits v. Off. of Mgmt. & Budget, No. 25-239, 2025 WL 314433 (D.D.C. Jan. 28, 2025).

	Caption	Main Topic	Notes
4	New York v. Trump, No. 25-CV-01144, 2025 WL 435411 (S.D.N.Y. Feb. 8, 2025)	Information Disclosure	TRO against Department of the Treasury policy expanding access to the payment systems of the Bureau of Fiscal Services to political appointees and “special government employees”; PI entered 2025 WL 573771 (S.D.N.Y. Feb. 21, 2025)
5	Ass’n of Am. Medical Colls. v. Nat’l Insts. of Health, Order Granting Plaintiffs’ Emergency Motion for TRO, No. 25-CV-10340 (D. Mass. Feb. 10, 2025)	Federal Funding	TRO against National Institutes of Health Supplemental Guidance to the 2024 NIH Grants Policy Statement: Indirect Cost Rates (NOT-OD-25-068) related to grants for biomedical research; PI entered <i>sub nom.</i> Massachusetts v. Nat’l Insts. of Health, No. 25-CV-10338, 2025 WL 702163 (D. Mass. Mar. 5, 2025)
6	AIDS Vaccine Advocacy Coal. v. U.S. Dep’t of State, No. 25-00400, 2025 WL 485324 (D.D.C. Feb. 13, 2025)	Federal Funding	TRO against Exec. Order No. 14,169, Reevaluating and Realigning United States Foreign Aid; ²³ PI entered 2025 WL 752378 (D.D.C. Mar. 10, 2025)
7	Doe v. Trump, No. 25-10135-LTS, 2025 WL 485070 (D. Mass. Feb. 13, 2025)	Birthright Citizenship	PI against Exec. Order No. 14,160, Protecting the Meaning and Value of American Citizenship
8	PFLAG, Inc. v. Trump, No. 25-337-BAH, 2025 WL 510050 (D. Md. Feb. 14, 2025)	Federal Funding	TRO against Exec. Order No. 14,168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government, and Exec. Order No. 14,187, Protecting Children from Chemical and Surgical Mutilation; PI entered 2025 WL 685124 (D. Md. Mar. 4, 2025)
9	Nat’l Ass’n of Diversity Officers in Higher Educ. v. Trump, No. 1:25-cv-00333-ABA, 2025 WL 573764 (D. Md. Feb. 21, 2025)	DEI	PI against Exec. Order No. 14,151, Ending Radical and Wasteful Government DEI Programs and Preferencing, and Exec. Order No. 14,173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity
10	Pacito v. Trump, No. 2:25-cv-255-JNW, 2025 WL 655075 (W.D. Wash. Feb. 28, 2025)	Immigration	PI against Exec. Order No. 14,163, Realigning the United States Refugee Admissions Program; additional PI against termination of funding agreements entered 2025 WL 893530 (W.D. Wash. Mar. 24, 2025)
11	Am. Fed’n of Gov’t Emps., AFL-CIO v. Office of Personnel Mgmt., No. C 25-01780 WHA, 2025 WL 660053 (N.D. Cal. Feb. 28, 2025)	Federal Employment	TRO against Office of Personnel Management memorandum and other actions related to termination of probationary federal employees; PI entered 2025 WL 820782 (Mar. 14, 2025)

²³ After the defendants in this case allegedly failed to comply with the TRO, the district court issued an order granting enforcement of the TRO. *AIDS Vaccine Advocacy Coal. v. U.S. Dep’t of State*, No. 25-00400, 2025 WL 569381 (D.D.C. Feb. 20, 2025). The government sought review and a stay of the order of enforcement from the Supreme Court. Chief Justice Roberts entered an administrative stay and referred the matter to the full Court, which ultimately denied the application, vacated the administrative stay, and remanded to the district court for further proceedings. *U.S. Dep’t of State v. AIDS Vaccine Advocacy Coal.*, 145 S. Ct. 753 (2025) (Mem).

	Caption	Main Topic	Notes
12	Maryland v. U.S. Dep’t of Agric., No. JKB-25-0748, 2025 WL 800216 (D. Md. Mar. 13, 2025)	Federal Employment	TRO against termination of probationary federal employees
13	Am. Ass’n of Colleges for Teacher Educ. v. McMahon, No. 1:25-cv-00702-JRR, 2025 WL 833917 (D. Md. Mar. 17, 2025)	Federal Funding	PI against termination of certain funding awards by the Department of Education ²⁴
14	Talbott v. United States, No. 25-cv-00240, 2025 WL 842332 (D.D.C. Mar. 18, 2025)	Military Service	PI against Exec. Order No. 141,83, Prioritizing Military Excellence and Readiness
15	Am. Fed’n of State, Cnty. & Municipal Emps., AFL-CIO v. Social Sec. Admin., Temporary Restraining Order, No. 1:25-cv-00596, 2025 WL 868953 (D. Md. Mar. 20, 2025)	Information Disclosure	TRO against Social Security Administration (SSA) decision to provide individuals affiliated with the Department of Government Efficiency with access to certain SSA records
16	Mass. Fair Hous. Ctr. v. U.S. Dep’t of Hous. & Urb. Dev., Temporary Restraining Order, No. 25-30041-RGS (D. Mass. Mar. 26, 2025)	Federal Funding	PI against termination of certain funding awards by the Department of Housing & Urban Development ²⁵
17	Shilling v. United States, 2025 WL 926866 (W.D. Wash. Mar. 27, 2025)	Military Service	PI against Exec. Order No. 141,83, Prioritizing Military Excellence and Readiness and related guidance

Source: CRS.

Author Information

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²⁴ Part of the PI in this case applied only to the plaintiffs, but the court also ordered the government not to “undertake to terminate, or terminate, any [Teacher Quality Partnership Program], [Supporting Effective Educator Development Program], and [Teacher and School Leader Incentive Program] awards in a manner this court has determined is likely unlawful as violative of the APA as described herein.” Am. Ass’n of Colleges for Teacher Educ. v. McMahon, No. 1:25-cv-00702-JRR, 2025 WL 833917 at *25 (D. Md. Mar. 17, 2025).

²⁵ Part of the TRO in this case applied only to the plaintiffs, but the court also enjoined the government from, among other things, “terminating any [Fair Housing Initiatives Program] grant,” except as authorized by law. Mass. Fair Hous. Ctr. v. U.S. Dep’t of Hous. & Urb. Dev., Temporary Restraining Order, No. 25-30041-RGS, at *2 (D. Mass. Mar. 26, 2025).

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