

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

URBAN SUSTAINABILITY DIRECTORS
NETWORK, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
AGRICULTURE, et al.,

Defendants.

Case No. 1:25-cv-01775-BAH

**LAND ACCESS PROGRAM PLAINTIFFS’ MOTION FOR A PRELIMINARY
INJUNCTION**

The Land Access Program Plaintiffs—2020 Farmers Cooperative, African Alliance of Rhode Island, Agrarian Land Trust, Arthur Morgan Institute d/b/a the Agraria Center, Black Oregon Land Trust, Center for Heirs’ Property Preservation, Cultivate Kansas City, Four Bands Community Fund, Inc., Heru Urban Farming, H.O.P.E. for Small Farm Sustainability, Iowa Valley RC&D, Kansas Black Farmers Association, King County, Washington, NDN Collective, Inc., Northeast Organic Farming Association of New Jersey, OurSpace World, Inc., Rural Advancement Foundation International–USA, San Diego Food System Alliance, Sustainable Iowa Land Trust, THRIVE Santa Ana, Urban Oasis Project, Inc., Grow Food dba Viva Farms, Workin Rootz, and World Farmers—respectfully move, pursuant to Federal Rule of Civil Procedure 65 and this Court’s inherent equitable powers, for a preliminary injunction. For the reasons presented in the accompanying statement of points and authorities, the Court should enter an order that enjoins Defendants’ terminations of these Plaintiffs’ grants and restores the status quo ante, as well as any other relief the Court deems proper. Indeed, as the points and authorities explains, the Court could also grant equivalent relief under the APA.

The Land Access Program Plaintiffs meet the standard for preliminary relief because they are likely to prevail on the merits of their claims that the terminations are contrary to law and arbitrary and capricious and thereby violate the APA, absent an injunction these Plaintiffs will suffer irreparable harm, the equities favor an injunction, and an injunction is in the public interest. Specifically, without an injunction, these Plaintiffs will suffer irreparable harm because, *inter alia*, the terminations undermine their missions, threatens the viability of organizations, threatens the livelihoods of staff, and undermines the communities these Plaintiffs' serve, including through harming the trust in and reputations of these Plaintiffs. Equities and the public interest favor an injunction to prevent those harms and to ensure the government follows the law.

Plaintiffs also request that the Court exercise its discretion to dispense with requiring Plaintiffs to post a bond to obtain this relief. As detailed in the attached points and authorities, a bond is unwarranted because it would undermine judicial relief and contravene the law, which requires Defendants to restore funding to Plaintiffs. Numerous courts have held similarly.

Plaintiffs have met and conferred with Defendants. They oppose this motion. Nonetheless, Defendants have repeatedly delayed this action. Thus, should Defendants fail to provide a timely opposition, the Court exercise its discretion to grant *ex parte* relief.

Dated this 26th day of May 2026.

Respectfully submitted,

/s/Carrie Apfel

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