

Supreme Court Update: Trump v. CASA, Inc. – Fundamental Shift in Federal Injunctive Relief Strategy

The Supreme Court's 6-3 decision in *Trump v. CASA, Inc.* (2025) has fundamentally altered the federal litigation landscape by severely restricting courts' authority to issue universal injunctions. This ruling requires immediate strategic reconsideration for any organization seeking to challenge federal policies nationwide.

The Decision: A Fundamental Shift in Federal Remedial Practice

Three federal district courts issued universal preliminary injunctions blocking President Trump's Executive Order 14160, which attempted to redefine birthright citizenship. Rather than defending the Order's constitutionality, the government challenged only the courts' authority to issue injunctions protecting non-parties under the Judiciary Act of 1789.

Justice Barrett's majority opinion held that universal injunctions — orders protecting all persons nationwide, not just named plaintiffs — exceed federal courts' equitable authority. The Court applied a strict historical test, finding no precedent for such broad relief in founding-era English equity practice. Crucially, the Court distinguished between providing "complete relief" to parties (permissible) versus "universal relief" extending to non-parties (impermissible).

Key Legal Principles Established

- **Historical Limitation:** Federal equitable remedies are constrained to those "traditionally accorded by courts of equity" at the nation's founding
- **Party-Specific Relief:** Injunctions must focus on remedying specific plaintiffs' injuries, not protecting the general public
- **Class Action Alternative:** Universal injunctions improperly circumvent Rule 23's procedural safeguards for group litigation
- **Complete Relief Exception:** Courts may still provide broad relief when necessary to fully remedy named plaintiffs' injuries

Immediate Strategic Consequences

- **End of Single-Court Nationwide Relief:** Clients can no longer rely on one favorable district court to halt federal policies nationwide — a powerful tool that is now largely extinct.
- **Dramatically Increased Litigation Complexity:** Achieving broad protection now requires either:
 - Formal nationwide class action certification under Rule 23
 - Coordinated multi-district litigation campaigns
 - Demonstrating that narrow relief cannot provide "complete relief" to named plaintiffs
- **Patchwork Enforcement Risk:** Federal policies may be enjoined in some jurisdictions while remaining enforceable elsewhere, creating operational uncertainty for national organizations.
- **Enhanced Appellate Focus:** As Justice Kavanaugh's concurrence emphasized, major policy disputes will more frequently require rapid Supreme Court intervention to ensure national uniformity.

Trump v. CASA represents one of the most significant shifts in federal remedial practice in decades. While the decision creates substantial new challenges to federal civil practice, particularly in cases that seek broad equitable relief, law firms with significant class action experience, such as Chambliss, are strongly positioned to understand the

procedural and substantive challenges involved in seeking or responding to demands for broad relief including nationwide injunctive relief. For consultation on adapting your litigation strategy to the post-CASA environment, contact your relationship attorney or a member of our firm's [Litigation Practice Group](#).