

The Future of Nationwide Injunctions

Analyzing the Supreme Court's Decision in
Trump v. CASA



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Background

On June 27, 2025, the U.S. Supreme Court issued a 6–3 decision in [Trump v. CASA](#), significantly limiting the authority of federal courts to issue nationwide injunctions—including those blocking presidential actions. The ruling narrows the permissible scope of injunctive relief to what is necessary to provide complete relief only to the plaintiffs before the court.

At the center of this case is President Trump's [Executive Order 14160](#), "Protecting the Meaning and Value of American Citizenship." The order seeks to deny birthright citizenship to children born in the United States to certain non-citizen parents. In response, plaintiffs in three separate lawsuits argued that the order violates the U.S. Constitution and the Immigration and Nationality Act. They requested temporary injunctive relief to prevent the order from taking effect while their legal challenges proceeded.

Each of the three federal district courts granted nationwide injunctions, concluding that the plaintiffs were likely to succeed on the merits of their claims and that immediate relief was necessary to prevent irreparable harm. These injunctions blocked the executive order from being implemented across the country.

The Trump Administration appealed, asking the Supreme Court to review whether lower courts have the authority to issue nationwide injunctions—broad orders that halt federal policies not just for the plaintiffs in a case, but nationwide. This procedural question—rather than the underlying constitutional issues—became the focal point of the Court's review in *Trump v. CASA*.

Summary of the Decision

The Supreme Court found that the district courts exceeded their authority under the Judiciary Act of 1789 when it issued nationwide temporary relief. Writing for the majority, Justice Amy Coney Barrett emphasized that equitable relief must be tailored to the parties before the court. The ruling granted a partial stay, allowing the executive order to proceed where no injunction is in place.

Although the Court did not rule on the constitutionality of the order, it directed lower courts to reassess the scope of temporary injunctive relief in light of its decision. The Court also left open the possibility of broader relief in certain cases, such as those involving state plaintiffs, signaling that this decision may not be the final word on nationwide injunctions. There is also an open question of whether universal injunctive relief is available in cases raising challenges under the Administrative Procedure Act. The separate dissenting opinions by Justice Sonia Sotomayor and Justice Ketanji Brown Jackson warned that the ruling weakens uniform constitutional protections, expands executive power, and poses a threat to the rule of law.

Implications of the Decision

Nationwide injunctions—broad forms of temporary relief—have been viewed as important tools for promoting fairness, ensuring uniform enforcement of federal law, and preventing harm while legal challenges are resolved. Proponents argue they are essential in high-impact cases affecting large populations. Critics, however, contend that such sweeping relief concentrates too much power in the hands of individual judges, allowing them to halt federal policies nationwide. The Supreme Court's decision in *Trump v. CASA* extends well beyond the issue of birthright citizenship, marking a significant shift in how temporary relief may be granted in federal courts going forward. Below are potential implications of the ruling:

- **Supreme Court Limits District Courts' Authority to Issue Nationwide Injunctions:** The Court has effectively narrowed the type of temporary relief available in the lower courts. Moving forward, district courts must tailor injunctive relief to provide complete relief to the plaintiffs before them—without extending beyond what is necessary to do so.
- **Expansion of Executive Branch Power:** By restricting the judiciary's authority to issue nationwide injunctions, the Court's decision enhances executive power, making it more challenging to block presidential actions on a nationwide scale—regardless of the party in power. While the ruling is grounded in the Court's interpretation of the Judiciary Act, Congress retains the authority to legislate and define the scope of injunctive relief available to federal courts.
- **Potential Increase in Individual and Class Action Litigation:** The Court's decision may prompt an increase in individual and class action lawsuits as alternatives to nationwide injunctions. However, class actions present significant hurdles—certifying a class is often complex, costly, and time-consuming. Requiring individuals to seek relief case by case may create substantial barriers, particularly for under-resourced individuals and communities, potentially limiting access to meaningful legal remedies.
- **Supreme Court Signals Limits on Judicial Power to Require Executive Branch to Comply with Law:** In its majority opinion, the Court acknowledged that while the Executive Branch is obligated to follow the law, "the Judiciary does not have unbridled authority to enforce this obligation—in fact, sometimes the law prohibits the Judiciary from doing so." Although this language is not central to the Court's ruling, it raises serious concerns about whether the Court views its power as sufficient to compel executive branch compliance with the law. This stance could potentially undermine the Judiciary's ability to hold the President accountable under the law.
- **Maintains the Supreme Courts Ability to Issue Universal Injunctions:** In his concurring opinion, Justice Kavanaugh emphasized that while the Court limited the authority of district courts to issue universal injunctions, the Supreme Court itself retains the power to determine the interim legal status of major federal statutes and executive actions. This affirms the Court's continued role as the ultimate arbiter in high-stakes legal disputes, even before a final decision on the merits is reached.