

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

S.N., a minor child, by and through her parents, A.N. and C.N., and
on their own behalf v. Independent School District No. 630

S.N. · No. Civ. No. 25-4265 (JWB/LIB) · Decided November 26, 2025

SUMMARY

The United States District Court for the District of Minnesota denied without prejudice a motion for a preliminary injunction seeking to compel a school district to allow a student to play varsity girls' basketball for a neighboring district through a cooperative sponsorship. Applying the Title IX participation-opportunity framework and the Dataphase factors, the court found a viable athletic opportunity but no sufficient showing that the district acted unreasonably or discriminatorily, and concluded that timing, administrative constraints, and program disruption weighed against interim relief.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Jerry W. Blackwell
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	November 26, 2025
DOCKET	Civ. No. 25-4265 (JWB/LIB)
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiffs sought a preliminary injunction compelling the school district to take steps permitting S.N. to play the 2025-2026 varsity girls' basketball season for a neighboring school district. The court denied the motion without prejudice.
STANDARD OF REVIEW	Preliminary injunctive relief is governed by the Dataphase factors: likelihood of success on the merits, irreparable harm, balance of harms, and public interest. The plaintiff bears the burden of showing a likelihood, rather than a mere possibility, of success.
PRECEDENTIAL VALUE	unpublished district court order; persuasive value only
PARTIES	S.N., a minor child, by and through her parents, A.N. and C.N., and on their own behalf v. Independent School District No. 630

TOPICS

injunctions

civil rights

remedies

civil procedure

PRACTICE AREAS

civil rights

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injunctive relief

intercollegiate and interscholastic athletics

QUESTIONS PRESENTED

1. Whether Plaintiffs were likely to succeed on their Title IX claim that Red Lake Falls failed to reasonably accommodate a viable opportunity for girls' varsity basketball under the third prong of the Title IX athletics framework.
2. Whether the Dataphase factors supported a preliminary injunction requiring Red Lake Falls to facilitate S.N.'s participation on Red Lake County Central's varsity girls' basketball team after the season had begun.
3. Whether the requested midseason cooperative sponsorship was feasible and consistent with the public interest in orderly administration of interscholastic athletics.

HOLDINGS

1. At the preliminary-injunction stage, Plaintiffs did not demonstrate a likelihood of proving that the District violated Title IX by failing to reasonably accommodate girls' varsity basketball.
2. The Dataphase factors did not support preliminary injunctive relief.
3. The Title IX athletics three-part framework remained applicable because it interprets the Department of Education's regulation, and its continued use was not displaced by *Loper Bright Enterprises v. Raimondo*.

KEY QUOTATIONS

“Title IX does not require a district to accomplish what administrative and practical circumstances make impossible.”

“This Court will not restructure operating athletic programs midseason or impose multi-year co-ops between districts without a fully developed record and a clear showing of entitlement.”

FACTUAL BACKGROUND

S.N. had played varsity girls' basketball for Red Lake Falls during three prior school years, but Red Lake Falls could not field a varsity girls' basketball team for the 2025-2026 season. Neighboring Red Lake County Central was willing to accept S.N. under certain cooperative-sponsorship structures, but the districts did not agree to a qualifying arrangement, and the Minnesota State High School League deadline for submitting a cooperative sponsorship had passed before Plaintiffs demanded that S.N. be permitted to play there. The district declined proposed arrangements for sex-neutral reasons, including preserving its volleyball and softball programs, maintaining the Red Lake Falls Eagles identity, and continuing to rebuild its own girls' basketball program;

Plaintiffs identified no male comparator who had been allowed to play for another district outside a cooperative sponsorship.

PROCEDURAL HISTORY

Plaintiffs filed suit asserting, among other claims, a Title IX participation-opportunity claim and sought interim injunctive relief. After briefing and a November 20, 2025 hearing, the district court evaluated the Dataphase factors and denied the preliminary injunction because Plaintiffs had not shown a likelihood of success on the Title IX claim and the remaining factors did not overcome that deficiency.

DISPOSITION

denied

CASES CITED

- Dataphase Sys., Inc. v. C L Sys., Inc., 640 F.2d 109, 113 (8th Cir. 1981) (en banc)
- Watkins Inc. v. Lewis, 346 F.3d 841, 844 (8th Cir. 2003)
- Cigna Corp. v. Bricker, 103 F.4th 1336, 1342 (8th Cir. 2024)
- Portz v. St. Cloud State Univ., 16 F.4th 577, 580-81 (8th Cir. 2021)
- Chalenor v. Univ. of N.D., 291 F.3d 1042, 1044-45 (8th Cir. 2002)
- Loper Bright Enters. v. Raimondo, 603 U.S. 175 (2024)
- Kisor v. Wilkie, 588 U.S. 558 (2019)
- Jet Midwest Int'l Co. v. Jet Midwest Grp., LLC, 953 F.3d 1041, 1044 (8th Cir. 2020)
- Brenden v. Indep. Sch. Dist. 742, 477 F.2d 1292, 1299 (8th Cir. 1973)

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