

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Keira M., minor, by next friend Stacie Odeneal, et al. v. Margie Quin,
Commissioner, Tennessee Department of Children's Services, et al.

Keira M. · No. 3:25-cv-00566 · Decided April 20, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee denied plaintiffs’ Emergency Motion for a Preliminary Injunction seeking to prevent Tennessee Department of Children’s Services officials from placing foster children in temporary housing that allegedly fails to meet their basic needs. The court held that the named plaintiffs had not shown a certain and immediate risk of irreparable harm, while denying the motion without prejudice to renewal if their circumstances change.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Aleta A. Trauger
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	April 20, 2026
DOCKET	3:25-cv-00566
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved for an emergency preliminary injunction barring Tennessee Department of Children's Services officials from placing or maintaining putative class members in temporary housing that allegedly failed to meet their basic human needs. After briefing, evidentiary submissions, and an April 17, 2026 hearing, the court denied the motion without prejudice.
STANDARD OF REVIEW	A preliminary injunction requires consideration of the movant's likelihood of success on the merits, irreparable harm absent relief, harm to third parties, and the public interest. The plaintiff bears the burden, and a showing of imminent and irreparable harm is indispensable; speculative or remote future injury is insufficient.

PRECEDENTIAL VALUE	Unpublished federal district court memorandum and order; persuasive rather than precedential outside the case.
PARTIES	Keira M., minor, by next friend Stacie Odeneal, et al. v. Margie Quin, Commissioner, Tennessee Department of Children's Services, et al.

TOPICS

injunctions standing class actions constitutional law civil procedure

PRACTICE AREAS

civil procedure constitutional law civil rights remedies

QUESTIONS PRESENTED

1. Whether the plaintiffs established the imminent and irreparable harm required for a preliminary injunction.
2. Whether the named plaintiffs could establish standing for prospective injunctive relief based on alleged future harm to putative class members.
3. Whether the emergency motion for a preliminary injunction should be granted.

HOLDINGS

1. A preliminary injunction cannot issue when the plaintiffs fail to show that a named plaintiff is likely to suffer imminent and irreparable harm before a decision on the merits.
2. Plaintiffs seeking prospective injunctive relief must show that they personally face the required injury; the risk of future harm to unidentified, nonparty putative class members cannot substitute for that showing.

KEY QUOTATIONS

“The plaintiffs have not presented any evidence from which the court could conclude that any named plaintiff is at imminent risk that his or her current placement will disrupt; even if there were, there is no evidence from which the court could conclude that it is /ikely, as opposed to merely possible, that such disruption will lead to a violation of his or her constitutional rights.”

“In short, the court finds that the plaintiffs have not carried their burden of establishing that any single named plaintiff is likely to suffer harm if a preliminary injunction is not entered now, before the court can issue a final decision on the merits.”

“The Emergency Motion for Preliminary Injunction, therefore, is DENIED, but without prejudice to the plaintiffs’ ability to return to court if their situation changes and they are able to establish the requisite risk of harm.”

FACTUAL BACKGROUND

The plaintiffs alleged that Tennessee Department of Children's Services officials had housed foster children in temporary housing that failed to meet their basic human needs, and they presented evidence that putative class members had suffered constitutional violations from past practices. The nineteen named plaintiffs were foster children in DCS custody. The court found no evidence that any named plaintiff was at imminent risk of a placement in the challenged temporary housing or that temporary housing per se would violate constitutional rights.

PROCEDURAL HISTORY

The plaintiffs filed an Emergency Motion for a Preliminary Injunction, supported by a memorandum and evidentiary materials. The defendants opposed the motion, and the plaintiffs replied. The court heard oral argument and announced that plaintiffs had not met their burden, then issued this memorandum explaining the denial.

DISPOSITION

other

CASES CITED

- Univ. of Texas v. Camenisch, 451 U.S. 390, 395 (1981)
- Stenberg v. Cheker Oil Co., 573 F.2d 921, 925 (6th Cir. 1978)
- Winter v. Nat'l Res. Def. Council, 555 U.S. 7, 20, 22, 24 (2008)
- Amoco Prod. Co. v. Vill. of Gambell, 480 U.S. 531, 542 (1987)
- Jones v. Caruso, 569 F.3d 258, 265 (6th Cir. 2009)
- Moms for Liberty - Wilson Cnty., Tenn. v. Wilson Cnty. Bd. of Educ., 155 F.4th 499, 513 (6th Cir. 2025)
- Obama for Am. v. Husted, 697 F.3d 423, 436 (6th Cir. 2012)
- D.T. v. Sumner Cnty. Schs., 942 F.3d 324, 326-27 (6th Cir. 2019)
- Friendship Materials, Inc. v. Mich. Brick, Inc., 679 F.2d 100, 105 (6th Cir. 1982)
- Warth v. Seldin, 422 U.S. 490, 502 (1975)
- O'Shea v. Littleton, 414 U.S. 488, 494-96 (1974)
- Fox v. Saginaw Cnty., 67 F.4th 284, 294 (6th Cir. 2023)
- Blum v. Yaretsky, 457 U.S. 991, 1001 n.13 (1982)
- Memphis A. Philip Randolph Inst. v. Hargett, 978 F.3d 378, 386 (6th Cir. 2020)
- Clapper v. Amnesty Int'l USA, 568 U.S. 398, 409 (2013)
- Mich. Coal. of Radioactive Material Users, Inc. v. Griepentrog, 945 F.2d 150, 154 (6th Cir. 1991)