

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
DAKOTA, SOUTHERN DIVISION

Estela Elizabeth Jeffcoat v. Brookings Housing & Redevelopment
Commission

4:25-CV-04166-CCT · No. 4:25-CV-04166-CCT · Decided December 31, 2025

SUMMARY

The United States District Court for the District of South Dakota denied Estela Elizabeth Jeffcoat’s pro se motion for an emergency temporary restraining order, preliminary injunction, and order compelling discovery against the Brookings Housing & Redevelopment Commission. The court held that Jeffcoat had not shown a likelihood of success on the merits and that her motion to compel lacked the required certification and a sufficient legal basis for production. The order was dated December 31, 2025.

CASE DETAILS

COURT	United States District Court for the District of South Dakota, Southern Division
WRITING FOR THE COURT	Camela C. Theeler
JURISDICTION	United States District Court for the District of South Dakota, Southern Division
DECIDED	December 31, 2025
DOCKET	4:25-CV-04166-CCT
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for an emergency temporary restraining order, preliminary injunction, and an order compelling discovery in her action alleging violations of the Fair Housing Act, the Rehabilitation Act, and HUD program requirements.
STANDARD OF REVIEW	A party seeking a temporary restraining order or preliminary injunction must establish the Dataphase factors, including irreparable harm, the balance of harms, likelihood of success on the merits, and the public interest. The burden rests on the movant. A motion to compel must also satisfy Federal Rule of Civil Procedure 37(a)(1) and applicable local certification requirements.
PRECEDENTIAL VALUE	unpublished district court order

PARTIES

Estela Elizabeth Jeffcoat v. Brookings Housing & Redevelopment Commission

TOPICS

injunctions discovery dispute civil procedure ada / disability

PRACTICE AREAS

civil procedure injunctive relief discovery fair housing disability rights

QUESTIONS PRESENTED

1. Whether Jeffcoat was entitled to an emergency temporary restraining order or preliminary injunction concerning her Housing Choice Voucher and related housing matters.
2. Whether Jeffcoat was entitled to an order compelling production of portability, income, rent, verification, and disability-accommodation documents.

HOLDINGS

1. The court denied injunctive relief because Jeffcoat failed to demonstrate a likelihood of success on the merits of her claims against the Commission.
2. The court denied the motion to compel because Jeffcoat did not establish a sufficient basis for production of the requested documents and did not comply with the applicable certification requirements.

KEY QUOTATIONS

“A preliminary injunction [or temporary restraining order] is an extraordinary remedy never awarded as of right.”

“Its ‘primary function is to preserve the status quo until a court may grant full relief upon a final hearing.’”

“Therefore, the purpose of this extraordinary remedy ‘is not to give the movant the ultimate relief he seeks.’”

“Because Ms. Jeffcoat has not shown a likelihood of success on the merits of her claims against the Defendant, an injunction cannot issue.”

FACTUAL BACKGROUND

Jeffcoat alleged that the Commission violated federal housing, disability, and HUD requirements in administering her Housing Choice Voucher. She sought to prevent expiration, suspension, termination, withholding, or denial of an extension of the voucher, and requested orders concerning portability, disability accommodations, and related documents. Although she submitted communications and other exhibits concerning the voucher, the court found that she had not shown a fair chance of success on the merits or established a legal basis for the requested discovery.

PROCEDURAL HISTORY

Jeffcoat commenced the federal action against the Brookings Housing & Redevelopment Commission. She then filed an emergency motion seeking to preserve and extend her Housing Choice Voucher, require correction and resubmission of a portability packet, prohibit denial of disability accommodations, and compel production of documents. The district court denied all requested relief.

DISPOSITION

other

CASES CITED

- Next Level Tech. Grp. LLC v. Wehde Enterps., LLC, 4:24-CV-04199-KES, 2024 WL 5108943, *5 (D.S.D. Dec. 13, 2024)
- Mgmt. Registry, Inc. v. A.W. Cos., Inc., 920 F.3d 1181, 1183 (8th Cir.)
- Dataphase Sys., Inc. v. C L Sys., Inc., 640 F.2d 109, 113 (8th Cir. 1981) (en banc)
- Winter v. Nat'l Res. Def. Council, Inc., 555 U.S. 7, 24 (2008)
- Wilbur-Ellis Co., LLC v. Jens, 139 F.4th 608, 611 (8th Cir. 2025)
- Lindell v. United States, 82 F.4th 614, 618 (8th Cir. 2023)
- Sanborn Mfg. Co., Inc. v. Campbell Hausfeld/Scott Fetzer Co., 997 F.2d 484, 490 (8th Cir. 1993)
- Home Instead, Inc. v. Florance, 721 F.3d 494, 497 (8th Cir.)
- Mid-Am. Real Estate Co. v. Ia. Realty Co., Inc., 406 F.3d 969, 972 (8th Cir.)
- Firearms Reg. Acc. Coalition, Inc. v. Garland, 112 F.4th 507, 517 (8th Cir. 2024)

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