be maintained where there was a full and adequate remedy at law. Although this provision did no more than declare a pre-existing rule long applied in chancery courts,[301] it did assert the power of Congress to regulate the equity powers of the federal courts. The Act of March 2, 1793,[302] prohibited the issuance of any injunction by any court of the United States to stay proceedings in state courts except where such injunctions may be authorized by any law relating to bankruptcy proceedings. In subsequent statutes, Congress prohibited the issuance of injunctions in the federal courts to restrain the collection of taxes,[303] provided for a three-judge court as a prerequisite to the issuance of injunctions to restrain the enforcement of state statutes for unconstitutionality,[304] for enjoining federal statutes for unconstitutionality,[305] and for enjoining orders of the Interstate Commerce Commission,[306] limited the power to issue injunctions restraining rate orders of state public utility commissions,[307] and the use of injunctions in labor disputes,[308] and placed a very rigid restriction on the power to enjoin orders of the Administrator under the Emergency Price Control Act.[309]

Perhaps pressing its powers further than prior legislation, Congress has enacted the Prison Litigation Reform Act of 1996.[310] Essentially, the law imposes a series of restrictions on judicial remedies in prison-conditions cases. Thus, courts may not issue prospective relief that extends beyond that necessary to correct the violation of a federal right that they have found, that is narrowly drawn, is the least intrusive, and that does not give attention to the adverse impact on public safety. Preliminary injunctive relief is limited by the same standards. Consent decrees may not be approved unless they are subject to the same conditions, meaning that the court must conduct a trial and find violations, thus cutting off consent decrees.

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[301] Boyce's Executors v. Grundy, 28 U.S. (3 Pet.) 210 (1830).

[302] 1 Stat. 333, 28 U.S.C. § 2283.

[303] 26 U.S.C. § 7421(a).

[304] This provision was repealed in 1976, save for apportionment and districting suits and when otherwise required by an Act of Congress. Pub. L. 94–381, § 1, 90 Stat. 1119, and § 3, 28 U.S.C. § 2284. Congress occasionally provides for such courts, as in the Voting Rights Act, 42 U.S.C. §§ 1971, 1973c.

[305] Repealed by Pub. L. 94–381, § 2, 90 Stat. 1119 (1976). Congress occasionally provides for such courts now, in order to expedite Supreme Court consideration of constitutional challenges to critical federal laws. *See* Bowsher v. Synar, 478 U.S. 714, 719–721 (1986) (3-judge court and direct appeal to Supreme Court in the Balanced Budget and Emergency Deficit Control Act of 1985).

[306] Repealed by Pub. L. 93–584, § 7, 88 Stat. 1918.

[307] 28 U.S.C. § 1342.

[308] 29 U.S.C. §§ 52, 101–110.

[309] 56 Stat. 31, 204 (1942).

[310] The statute was part of an Omnibus Appropriations Act signed by the President on April 26, 1996. Pub. L. 104–134, §§ 801–10, 110 Stat. 1321–66—1321–77, amending 18 U.S.C. § 3626.