

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

COUNCIL FOR OPPORTUNITY IN
EDUCATION,

Plaintiff,

v.

U.S. DEPARTMENT OF EDUCATION,
et al.,

Defendants.

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Case No. 1:25-cv-3491-TSC

Case No. 1:25-cv-3514-TSC

NOTICE OF SETTLEMENT

Plaintiff Council for Opportunity in Education (“**Plaintiff**”) and Defendants U.S. Department of Education and Secretary of Education Linda McMahon (“**Defendants**”) (together, “**the Parties**”) advise the Court that the Parties have reached a settlement of the above-captioned cases (the “**Civil Actions**”).

The Parties negotiated and entered into a Settlement Agreement on September 30, 2026. Following Defendants’ compliance with certain terms of the Settlement Agreement, and on or before sixty-five (65) calendar days from the date of the Settlement Agreement, Defendants will file a Stipulation of Dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii) with the Court that will dismiss the Civil Actions with prejudice. The Stipulation of Dismissal will reflect that the Parties agree that the Court retains ongoing and ancillary jurisdiction over the Civil Actions for the purposes of interpreting and enforcing the terms and conditions of the Settlement Agreement, for a period of twelve (12) months from the date the Stipulation of Dismissal is filed.

Dated: September 30, 2026

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Respectfully submitted,

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*Counsel for the Council for Opportunity
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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2026, I served the foregoing document on all counsel of record using the Court's CM/ECF system.

/s/ Brandt P. Hill

Of Counsel