

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; STATE OF
WASHINGTON; STATE OF RHODE ISLAND;
STATE OF ARIZONA; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE OF
CONNECTICUT; STATE OF DELAWARE;
DISTRICT OF COLUMBIA; STATE OF
HAWAI'I; STATE OF ILLINOIS; STATE OF
MAINE; STATE OF MARYLAND;
COMMONWEALTH OF MASSACHUSETTS;
STATE OF MICHIGAN; STATE OF
MINNESOTA; STATE OF NEVADA; STATE OF
NEW JERSEY; STATE OF NEW MEXICO;
STATE OF OREGON; STATE OF VERMONT;
STATE OF WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE; PAMELA
BONDI, in her official capacity as ATTORNEY
GENERAL OF THE UNITED STATES; U.S.
DEPARTMENT OF HEALTH AND HUMAN
SERVICES; ROBERT F. KENNEDY, JR., in his
official capacity as SECRETARY OF THE U.S.
DEPARTMENT OF HEALTH AND HUMAN
SERVICES; U.S. DEPARTMENT OF
EDUCATION; LINDA McMAHON, in her official
capacity as SECRETARY OF THE U.S.
DEPARTMENT OF EDUCATION; U.S.
DEPARTMENT OF LABOR; LORI CHAVEZ-
DeREMÉR, in her official capacity as
SECRETARY OF THE U.S. DEPARTMENT OF
LABOR; U.S. DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT; and ERIC
SCOTT TURNER, in his official capacity as
SECRETARY OF THE U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT,

Defendants.

Case No. 1:25-cv-00345

STIPULATION

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1. Defendants have consented to Plaintiffs amending their complaint to add the Department of Housing and Urban Development (“HUD”) and Eric Scott Turner, the HUD Secretary in his official capacity, as Defendants (together, the “HUD Defendants”) and to add claims challenging the November 26, 2025, Notice titled “Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of ‘Federal Public Benefit,’” 90 Fed. Reg. 54,363 (Nov. 26, 2025) (the “HUD PRWORA Notice”).

2. Defendants agree to stay enforcement and application in Plaintiff States¹ of the HUD PRWORA Notice (and its contents) until the date on which judgment on the merits has been issued as to all claims in this action (“district court judgment date”).

3. Defendants agree that, regardless of the outcome of this litigation, including on any appeal, they will never enforce or in any way apply the HUD PRWORA Notice, including the interpretations of PRWORA expressed in that Notice, related to:

- a. conduct occurring prior to the district court judgment date;
- b. funds expended prior to the district court judgment date; or
- c. any other actions taken in reliance on this Stipulation prior to the district court judgment date.

4. Defendants’ agreement to this stay of enforcement and application is contingent on Plaintiffs filing a single motion for summary judgment that includes Plaintiffs’ challenges to all the PRWORA notices currently at issue in this case, namely, the DOJ, HHS, ED, DOL, and HUD notices.

¹ The Term States includes the Plaintiffs and their subdivisions and instrumentalities.

5. The Parties will promptly confer and propose to the Court any requested modifications to the current briefing schedule regarding cross-motions for summary judgment in order to take into account the newly-added HUD Defendants and claims and accommodate production of the Administrative Record from the newly-added HUD Defendants.

Respectfully submitted,

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