

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

STATE OF WASHINGTON, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT, *et al.*,

Defendants.

AND

NATIONAL ALLIANCE TO END
HOMELESSNESS, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT, *et al.*,

Defendants.

Case Nos. 25-cv-626-MSM-AEM
25-cv-636-MSM-AEM

District Judge Mary S. McElroy
Magistrate Judge Amy E. Moses

JOINT PROPOSAL FOR BRIEFING SCHEDULE

The parties in these two related cases, *State of Washington et al. v. HUD*, 25-cv-626, and *National Alliance to End Homelessness, et al. v. HUD*, 25-cv-636, have conferred and agree that Plaintiffs' claims should be resolved on dispositive motions on an expedited timeline. Plaintiffs' claims present primarily legal issues that are best resolved following the expedited production of an administrative record through a motion for partial summary judgment by Plaintiffs, *see State of Washington et al. v. HUD*, 25-cv-626, ECF No. 48; *National Alliance to End Homelessness, et al. v. HUD*, 25-cv-636, ECF No. 1, and a cross-motion for summary judgment by Defendants on the same set of claims. The parties in both cases have further agreed upon a joint proposed schedule for resolution of this matter.

The parties in both cases respectfully request that the Court enter the following schedule jointly governing all parties' forthcoming motions for summary judgment:

Defendants produce the remaining portion of the administrative record pertaining to the rescission of the FY24-FY25 CoC NOFO	December 29, 2025
Plaintiffs' Motion for Summary Judgment	January 7, 2026
Defendants' Combined Opposition and Cross-Motion for Summary Judgment	January 16, 2026
Plaintiffs' Combined Reply and Opposition	January 23, 2026
Defendants' Reply	January 29, 2026

The Government has indicated both to the Court and to Plaintiffs that it understands that Defendants are nearing completion of a new Notice of Funding Opportunity (NOFO), to issue in the coming days. Following the issuance of the new NOFO, should Plaintiffs, after examining the new NOFO, intend to pursue additional challenges to the new NOFO by amending their operative complaints, the parties expect to engage in good-faith discussions regarding the schedule for any additional briefing on any forthcoming claims. The parties also request that the Court defer any

deadlines to respond to Plaintiffs' complaints under Rule 12 until 30 days after the Court resolves the cross-motions.

DATE: December 19, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on December 19, 2025, the above document was filed with the CM/ECF filing system.

/s/ William S. Jankowski