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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LOS ANGELES HOMELESS SERVICES AUTHORITY, a joint powers authority,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as President of the United States of America; UNITED STATES

No. 2:26-cv-07056-DOC-AJR

JOINT STIPULATION TO MAINTAIN STATUS QUO AND ENJOIN SUSPENSION OF LOS ANGELES HOMELESS SERVICES AUTHORITY

[Proposed] Order filed concurrently herewith

Honorable David O. Carter
United States District Judge

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; SCOTT TURNER, in his official capacity as the Secretary of the U.S. Department of Housing and Urban Development; and DOES 1-10,

Defendants.

WAYMAKER

Plaintiff Los Angeles Homeless Services Authority ("LAHSA"), Plaintiff-Intervenor Los Angeles Continuum of Care ("LA CoC"), and Defendants Donald J. Trump, in his official capacity as President of the United States; the United States Department of Housing and Urban Development ("HUD"); and Scott Turner, in his official capacity as Secretary of HUD (collectively, "Defendants," and together with LAHSA and LA CoC, the "Parties"), by and through their counsel of record, stipulate as follows:

WHEREAS, on June 11, 2026, HUD issued a Notice of Immediate Suspension Pending Investigation suspending LAHSA under 2 C.F.R. § 180.800(b) and (d);

WHEREAS, on June 18, 2026, HUD issued a Notice of Proposed Remedial Actions against the LA CoC, based on the LAHSA's suspension;

WHEREAS, on August 13, 2026, the Court granted in part LAHSA's Motion for a Preliminary Injunction (Dkt. 63), which by its terms remains in effect until October 27, 2026 ("PI");

WHEREAS, on September 30, 2026, the Court entered an order continuing the status conference regarding the completeness of the administrative record to give the parties time to reach a resolution on all issues currently pending before the Court (Dkt. 100);

WHEREAS, Defendants appealed the PI (Dkt. 68), and on October 8, 2026, the Ninth Circuit vacated oral argument and held the appeal in abeyance pending the Parties' ongoing discussions toward a global resolution of this litigation (9th Cir. No. 26-5367, Dkt. 40.1);

WHEREAS, LA CoC has proceeded with the application process ordered by this Court to select a new collaborative applicant and lead administrators of the Homeless Management Information System ("HMIS), the Coordinated Entry System ("CES"), and the Point in Time ("PIT") Count, in compliance with the third provision of the PI (*see* Dkt. 63 at 27);

WHEREAS, pursuant to the applicant process ordered by this Court and consistent with its Charter, the LA CoC has designated the County as the new collaborative applicant and PIT Count administrator, and expects to designate LA County as HMIS Lead, and CES Management Entity before the October 27. 2026 hearing (*see* Dkt. 108);

WHEREAS, HUD has indicated it considers LA County an acceptable Collaborative Applicant, PIT Count administrator, HMIS Lead, and CES Management Entity (*see* Dkt. 121 at 1-2).

WHEREAS, the parties and the County are working together to facilitate a transition of these roles;

WHEREAS, LAHSA is continuing to function as, *inter alia*, HMIS lead, CES Management Entity, PIT Count Administrator, and grant administrator for the LA CoC in this interim period;

WHEREAS, LAHSA has submitted a Consolidated Application for the 2026 funding cycle to HUD which HUD has agreed to review and process in the ordinary course of the national competition notwithstanding LAHSA's continued roles on behalf of LA CoC and the planned future transfers of these roles (*see* Dkt. 108 and 121);

WHEREAS, LAHSA needs to continue to perform the functions currently delegated to it by the LA CoC until they can be transitioned to the County, and thus HUD's suspension of LAHSA needs to continue to be stayed through the duration of the litigation;

WHEREAS, the Parties are making significant progress towards reaching a global resolution of this litigation;

WHEREAS, the Parties wish to continue preserve the status quo, provide stability to the LA CoC throughout this transition, conserve the resources of the Parties and the Court, and facilitate those settlement discussions;

WAYMAKER

NOW, THEREFORE, the Parties stipulate and respectfully request that the Court enter an order as follows:

1. The Parties agree to that the Court should preserve the status quo that was in place as of October 26, 2026, through the end of the litigation to facilitate settlement negotiations.
2. The Parties agree that any issues regarding the completeness of the administrative record shall be held in abeyance to facilitate settlement negotiations.
3. The Parties therefore jointly request that the Court enter the Proposed Order which provides that LAHSA's suspension is enjoined and stayed through the duration of the litigation to facilitate its ongoing roles on behalf of the LA CoC through the period of transition, and the remedial measures proposed by HUD against LA CoC are likewise stayed.

IT IS SO STIPULATED.

WAYMAKER

Dated: October 26, 2026

Respectfully submitted,

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Attorneys for Defendants

Dated: October 26, 2026

Respectfully submitted,

WAYMAKER LLP

By: */s/ Keri Curtis Axel*
KERI CURTIS AXEL
Attorneys for Plaintiff
Los Angeles Homeless Services Authority

Dated: October 26, 2026

Respectfully submitted,

LEGAL AID FOUNDATION OF LOS ANGELES

By: */s/ Shayla Myers*
SHAYLA MYERS
Attorneys for Plaintiff-Intervenor Los Angeles Continuum of Care

* Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

WAYMAKER

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

LOS ANGELES HOMELESS SERVICES AUTHORITY, a joint powers authority,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as President of the United States of America; UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; SCOTT TURNER, in his official capacity as the Secretary of the U.S. Department of Housing and Urban Development; and DOES 1-10,

Defendants.

No. 2:26-cv-07056-DOC-AJR

[PROPOSED] ORDER GRANTING JOINT STIPULATION TO MAINTAIN STATUS QUO AND ENJOIN SUSPENSION OF LOS ANGELES HOMELESS SERVICES AUTHORITY

Honorable David O. Carter
United States District Judge

ORDER

Plaintiff the Los Angeles Homeless Services Authority; Plaintiff-Intervenor Plaintiff Los Angeles Continuum of Care; and Defendants Donald J. Trump, the United States Department of Housing and Urban Development, and Scott Turner (collectively, the "Parties") filed a joint stipulation requesting that the Court enter an Order maintaining the status quo.

Having considered the stipulation of the parties and good cause appearing, the Court **ORDERS** that:

1. This Court enjoins and stays HUD's suspension of LAHSA and therefore the remedial measures against the Los Angeles Continuum of Care through the conclusion of this litigation. The status quo that was in place as of October 26, 2026, shall be maintained and preserved by the Parties.

2. This Court holds in abeyance any issues in this litigation regarding the completeness of the administrative record, until and if, the parties determine there is a later need to discuss with the Court the completeness of the administrative record.

3. HUD will review and process the Consolidated Application submitted by LAHSA in the ordinary course of the national competition notwithstanding LAHSA's continued roles on behalf of the Los Angeles Continuum of Care and the planned future transfers of these roles.

IT IS SO ORDERED.

Dated:_____

_____
Hon. David O. Carter
United States District Judge

WAYMAKER