

1 BRETT A. SHUMATE
Assistant Attorney General
2 Civil Division

3 ERIC J. HAMILTON
Deputy Assistant Attorney General

4 JOSHUA S. HA
Counsel to the Assistant Attorney
5 General
6 Civil Division

7 NOAH T. KATZEN
Civil Division, Federal Programs Branch
8 *Attorneys for Defendants*
9

BILAL A. ESSAYLI
First Assistant United States Attorney
DANIEL A. BECK
Assistant United States Attorney
Chief, Civil Division
ALARICE M. MEDRANO
Assistant United States Attorney
Chief, Complex and Defensive Litigation
Section
ALEXANDER L. FARRELL (Cal. Bar
No. 335008)
Assistant United States Attorney
Federal Building, Suite 7516
300 North Los Angeles Street
Los Angeles, California 90012
Telephone: (213) 894-5557
E-mail: Alexander.Farrell@usdoj.gov

10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION
13

14 LOS ANGELES HOMELESS
15 SERVICES AUTHORITY, a joint
powers authority,

16 Plaintiff,

17 v.

18 DONALD J. TRUMP, in his official
19 capacity as President of the United
States of America, *et al.*,

20 Defendants.
21

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

**DEFENDANTS' RESPONSE TO
PLAINTIFF-INTERVENOR LOS
ANGELES CONTINUUM OF CARE'S
AMENDED STATUS REPORT [DKT.
108]**

Honorable David O. Carter
United States District Judge

1 Defendants Donald J. Trump, sued in his official capacity as President of the United
2 States of America, U.S. Department of Housing and Urban Development (“HUD”), and
3 Scott Turner, sued in his official capacity as Secretary of U.S. Department of Housing and
4 Urban Development (collectively the “Defendants”) by and through the undersigned
5 counsel responds, to Plaintiff-Intervenor Los Angeles Continuum of Care’s (“LA CoC”)
6 Amended Status Report. Dkt. 108.

7 The Court’s preliminary injunction order directed HUD to file a written response
8 regarding the LA CoC’s evaluation of the collaborative applicant pool within 7 days, or
9 by October 20, 2026. Dkt. 63.

10 LA CoC’s Amended Status Report states that it received only one full application
11 for the role of Collaborative Applicant, which it deemed to include the role of Point-in-
12 Time (PIT) Count Administrator, which was the County of Los Angeles Department of
13 Homeless Services and Housing (HSH). *See* Dkt. 108, p. 10. LA CoC reports that its
14 general membership voted to designate HSH as the new Collaborative Applicant on
15 October 13, 2026. *See id.* at 23-24. LA CoC has not yet provided formal written notice
16 and documentation to HUD of its Collaborative Applicant change, but HUD considers
17 HSH an acceptable Collaborative Applicant and PIT Count Administrator.

18 LA CoC’s Amended Status Report states that it received two full applications for
19 the role of Homeless Management Information System (HMIS) Lead, from HSH and the
20 City of Los Angeles (the City). In its Request for Qualifications (RFQ) Qualitative
21 Review and Interview process, LA CoC reports that HSH received the highest score for
22 this role and that LA CoC’s Board voted to select HSH as the new HMIS Lead. *See id.* at
23 16, 20-21. LA CoC reports that its general membership has not yet designated a new
24 HMIS Lead, but that it expects to do so. HUD considers HSH an acceptable HMIS Lead
25 and prefers HSH, which has been designated as the new Collaborative Applicant, to other
26 applicants to facilitate transition and future oversight of LA CoC’s roles in HUD programs.

27 LA CoC’s Amended Status Report states that it received three full applications for
28 the role of Coordinated Entry System (CES) Management Entity, from HSH, the City, and

1 United American Indian Involvement. *See id.* at 16-17. In its Request for Qualifications
2 (RFQ) Qualitative Review and Interview process, LA CoC reports that HSH received the
3 highest score for this role and that LA CoC's Board voted to select HSH as the new CES
4 Management Entity. *See id.* at 17-19, 21. LA CoC reports that its general membership
5 has not yet designated a new CES Management Entity, but that it expects to do so. HUD
6 considers HSH an acceptable CES Management Entity and prefers HSH, which has been
7 designated as the new Collaborative Applicant, to other applicants to facilitate transition
8 and future oversight of LA CoC's roles in HUD programs.

9 In providing this Response, HUD reserves all rights, responsibilities, and discretion
10 it has regarding approval and oversight of entities performing these roles for LA CoC.

11 Dated: October 20, 2026

Respectfully submitted,

12 BRETT A. SHUMATE
13 Assistant Attorney General
Civil Division

14 ERIC J. HAMILTON
15 Deputy Assistant Attorney General

16 JOSHUA S. HA
17 Counsel to the Assistant Attorney General
Civil Division

18 NOAH T. KATZEN
Civil Division, Federal Programs Branch

19 BILAL A. ESSAYLI
20 First Assistant United States Attorney

DANIEL A. BECK
21 Assistant United States Attorney
Chief, Civil Division

22 ALARICE M. MEDRANO
23 Assistant United States Attorney
Chief, Complex and Defensive Litigation Section

24
25 /s/ Alexander L. Farrell
26 ALEXANDER L. FARRELL
Assistant United States Attorney

27 Attorneys for Defendants
28