

WAYMAKER

1 Keri Curtis Axel (Bar No. 186847)
2 kaxel@waymakerlaw.com
3 Scott M. Malzahn (Bar No. 229204)
4 smalzahn@waymakerlaw.com
5 Ashley E. Martabano (Bar No. 236357)
6 amartabano@waymakerlaw.com
7 WAYMAKER LLP
8 515 S. Flower Street, Suite 3500
9 Los Angeles, California 90071
10 Telephone: (424) 652-7800
11 Facsimile: (424) 652-7850
12 Christopher Pelham (Bar No. 241068)
13 christopher.pelham@nortonrosefulbright.com
14 Abigail G. Urquhart (Bar No. 310547)
15 abigail.urquhart@nortonrosefulbright.com
16 Alex Scandroli (Bar No. 345278)
17 alex.scandroli@nortonrosefulbright.com
18 NORTON ROSE FULBRIGHT US LLP
19 555 South Flower Street, Forty-First Floor
20 Los Angeles, California 90071
21 Telephone: (213) 892-9200
22 Facsimile: (213) 892-9494
23 *Attorneys for Plaintiff*
24 *Los Angeles Homeless Services Authority*

25 **UNITED STATES DISTRICT COURT**

26 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

27 LOS ANGELES HOMELESS
28 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

Case No.: 2:26-cv-07056 PA (AJRx)

**PLAINTIFF LOS ANGELES
HOMELESS SERVICES
AUTHORITY'S *EX PARTE*
APPLICATION TO EXCEED
L.R. 11-6.1 WORD LIMIT ON
APPLICATION FOR
PRELIMINARY RELIEF**

**DECLARATION OF KERI CURTIS
AXEL IN SUPPORT ATTACHED**

1 URBAN DEVELOPMENT; SCOTT
2 TURNER, in his official capacity as the
3 Secretary of the U.S. Department of
4 Housing and Urban Development; and
5 DOES 1-10,

Defendants.

**NOTICE OF LODGING OF
PROPOSED APPLICATION FOR
PRELIMINARY RELIEF FILED
CONCURRENTLY HEREWITH**

Hearing Date: None Set
Hearing Time: None Set
Hon. Percy Anderson

WAYMAKER

**TO THIS HONORABLE COURT, ALL PARTIES AND THEIR
COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that plaintiff Los Angeles Homeless Services Authority (“LAHSA”) hereby submits this *ex parte* application for an order granting LAHSA permission to exceed the 7,000 word limit for its *Ex Parte* Application for Preliminary Relief under 5 U.S.C. Section 705, for a Temporary Restraining Order, and for Preliminary Injunction (the “Application for Preliminary Relief”). LAHSA is lodging the proposed Application for Preliminary Relief pursuant to a Notice of Lodging filed concurrently herewith.

The Local Rules of the U.S. District Court for the Central District of California state that “[e]xcept as otherwise provided in this rule or ordered by a judge, no memorandum of points and authorities, pretrial brief, trial brief, or posttrial brief may exceed 7,000 words, including headings, footnotes, and quotations but excluding the caption, the table of contents, the table of authorities, the signature block, the certification required by L.R. 11-6.2, and any indices and exhibits.” *See* L.R. 11-6.1.

LAHSA’s Application for Preliminary Relief is approximately 16,207 words in length, which is 9,207 words beyond the limit imposed by Local Rule 11-6.1. Because the Application for Preliminary Relief exceeds the limit imposed by the Local Rules, LAHSA requests leave of Court to file an overlong brief. An additional 9,207 words is necessary in order to properly address all facts and develop LAHSA’s arguments, which concern complex areas of constitutional, statutory, regulatory, and administrative law, applied to complex facts concerning the entire Southern California regional infrastructure for homeless services. The brief is 50 pages in length.

LAHSA is a Joint Powers Agency created by the City of Los Angeles and the County of Los Angeles that serves several key functions in the region’s provision of services to the unhoused. Among other things, LAHSA serves as the single

1 applicant for federal funds for the Los Angeles Continuum of Care (“CoC”), a
2 regional structure created by Congress to coordinate resources to address
3 homelessness at the local level. The Los Angeles CoC is by far the largest in the
4 country.

5 On June 11, 2026, the United States Department of Housing and Urban
6 Development (“HUD”) sent LAHSA a letter purporting to immediately suspend it
7 from participation in transactions with HUD. Because a suspension would
8 imminently cause the homeless services infrastructure in Los Angeles to collapse,
9 LAHSA now files suit and seeks to enjoin HUD from enforcing the suspension. The
10 facts surrounding LAHSA’s structure and the services it provides are intricate, and
11 the purported facts included in HUD’s June 11 letter date back to 2007. The
12 Application for Preliminary Relief also presents a wide array of legal issues, from
13 HUD’s violations of administrative law to constitutional and statutory issues.

14 LAHSA has undertaken every effort to keep the Application for Preliminary
15 Relief at a reasonable length given the breadth of material it covers. However, the
16 additional space is necessary to fully brief the Court on the issues, which center
17 around the critically important public policy topic of funding homelessness services
18 in Los Angeles.

19 Defendants will suffer no prejudice from the relief requested. To the extent
20 necessary, LAHSA would not oppose a request from the defendants to file a
21 similarly enlarged brief.

22 Pursuant to Local Rule 7-19.1, plaintiff’s counsel notified the last known
23 counsel for HUD of the date and substance of this Application, and also asked if any
24 Defendants intended to oppose it. (See Declaration of Keri Curtis Axel (the “Axel
25 Decl.”), ¶ 3.) The last known contact information for Defendants and their counsel is
26 as follows (Axel Decl. ¶ 4):

27 William M. Doolittle
28 Managing Attorney
U.S. Department of Housing & Urban Development

WAYMAKER

Office of Program Enforcement, Office of General Counsel
2415 Eisenhower Avenue, Room 17243
Alexandria, Virginia 22314
202-402-2037 (direct)
801-367-9823 (mobile)
202-708-2350 (main)
William.M.Doolittle@hud.gov

Jessica A. Brautigam
Trial Attorney
U.S. Department of Housing & Urban Development
Office of General Counsel, Office of Program Enforcement
2415 Eisenhower Ave., Room 17107
Alexandria, Virginia 22314
(202) 402-2084 (direct)
(202) 708-2350 (main)
Jessica.A.Brautigam@hud.gov

Dane M. Narode
Associate General Counsel
U.S. Department of Housing and Urban Development
Office of Program Enforcement
Office of General Counsel, CACC
Dane.M.Narode@hud.gov

Michael R. Ross
Senior Counsel
U.S. Department of Housing and Urban Development
Office of General Counsel
Michael.R.Ross@hud.gov

At 10:49 a.m. on June 26, LAHSA's counsel forwarded the email sent to HUD's last known counsel to Daniel Beck, Acting Chief, Civil Division of the U.S. Attorney's Office for the Central District of California, to ensure that the Local U.S. Attorney's Office had notice of Plaintiff's intent to file the Application. (*Id.* ¶ 5.) At 10:55 a.m., William M. Doolittle from HUD responded that HUD would oppose LAHSA's request for an enlarged brief. (*Id.* ¶ 6.)

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1 This *ex parte* application is based on this application, the Declaration of Keri
2 Curtis Axel, all other papers and pleadings on file with this Court, including
3 plaintiff's *Ex Parte* Application for Preliminary Relief, and all other matters of
4 which this Court may take judicial notice.

5 DATED: June 29, 2026

WAYMAKER LLP

7 By: /s/ Keri Curtis Axel
8 KERI CURTIS AXEL
9 *Attorneys for Plaintiff*

WAYMAKER

MEMORANDUM OF POINTS AND AUTHORITIES

I. LAHSA Requests an Enlarged Word Limit for the Application for Preliminary Relief, Which Presents Complex Issues of Fact and Law and Involves Issues of Critical Public Policy

Given the “inherent power to control [its] docket[],” this Court has the “full discretion to grant leave to exceed the page [or here, word] limits set forth in the Local Civil Rules[.]” *Traylor Bros., Inc. v. San Diego Unified Port Dist.*, 2012 WL 1019966, at *2 (S.D. Cal. Mar. 26, 2012) (citing *United States v. W.R. Grace*, 526 F.3d 499, 509 (9th Cir. 2008) (en banc)); see also *Ward v. Cal. Dep’t of Corr. and Rehab.*, 2013 WL 12246625, at *4 (C.D. Cal. June 26, 2013) (“A court has broad discretion to depart from the Local Rules.”) (citing *Ball v. Colco–Tylerton, L.P.*, 2002 WL 32985907, at *2 (C.D. Cal. Oct. 23, 2002)). Granting leave to file an enlarged brief is appropriate where, as LAHSA does here, “the movant adequately explains the need for additional pages.” *Siegler v. Sorrento Therapeutics, Inc.*, 2019 WL 4261054, at *2 (S.D. Cal. Sept. 9, 2019).

LAHSA’s request to file an enlarged brief is warranted here because the factual and legal issues presented in the Application for Preliminary Relief are deeply complex and touch on critical issues of public policy. *Hoopa Valley Tribe v. United States Bureau of Reclamation*, 2023 WL 3481144, at *1 (E.D. Cal. May 16, 2023) (court permitting parties to “significantly exceed standard page limits” in a “highly complex case addressing a range of issues” stemming from claims that the government violated federal water use laws). Here, the facts surrounding LAHSA’s function in the homeless services infrastructure are highly intricate. The brief is supported by over a dozen declarations that cover broad subject matters, such as LAHSA’s various responsibilities to the federal and local governments and other stakeholders, LAHSA’s maintenance of key databases, and the impact of potential suspension on LAHSA’s subgrantees. Additional length is necessary to properly summarize these facts, which are necessary to explain how HUD’s suspension of LAHSA will grind homeless services in Los Angeles to a halt.

Moreover, HUD’s 13-page suspension letter is a blunderbuss of allegations, some of which go back nearly 20 years. In order to demonstrate its likelihood of prevailing on its claims, LAHSA needs significant space to rebut HUD’s litany of misleading statements. (Axel Decl. ¶ 7.)

The accompanying legal issues to be addressed in the Application for Preliminary Relief are no less intricate. LAHSA must analyze technical HUD suspension regulations and delve into complex interrelated areas of constitutional, statutory and regulatory law. An enlarged brief will aid the Court in understanding these critical issues. *See also Bunda Market Inc. v. Caffebene Inc.*, [2015 WL 13915011](#), at *1, n.1 (C.D. Cal. Sept. 14, 2015) (granting leave to exceed 20 page limit by seven pages in “the interest of considering the merits of the dispute[.]”).

Homelessness—particularly in Los Angeles, which has by far the highest homeless population in the country—is a vitally important issue of public policy. The disposition of the Application for Preliminary Relief could have a massive, immediate effect of the unhoused population in the Los Angeles area. As such, LAHSA believes an enlargement is in order to ensure all issues are adequately briefed.

II. EX PARTE RELIEF IS WARRANTED

Ex parte relief under these circumstances is justified to avoid the threat of immediate or irreparable injury. *Horne v. Wells Fargo Bank, N.A.*, [969 F. Supp. 2d 1203, 1205](#) (C.D. Cal. 2013) (citing *In re Intermagnetics, Am.*, [101 B.R. 191, 193](#) (C.D. Cal. 1989)). Here, LAHSA’s Application for Preliminary Relief seeks immediate relief from a suspension imposed by HUD that presents an existential threat to LAHSA’s ability to provide housing and related services to the largest unhoused population in the nation. Time is of the essence. LAHSA can ill afford to wait to file a regularly noticed motion seeking leave to file an overlong brief, wait for an order, and only then file its Application for Preliminary Relief. LAHSA has no other option here but to seek immediate *ex parte* relief.

III. NOTICE OF *EX PARTE* APPLICATION

Pursuant to Local Rule 7-19.1, LAHSA's counsel notified the last known counsel for HUD of the date and substance of this Application, and also asked if any Defendants intended to oppose it. (Axel Decl. ¶ 3.) HUD's counsel responded on June 26, 2026 that it would oppose the request for an enlarged brief. (*Id.* ¶ 6.) HUD's also counsel requested to schedule a call to meet and confer on a briefing schedule for the Application for Preliminary Relief, to which LAHSA's counsel agreed. (*Id.*)

IV. CONCLUSION

For the foregoing reasons, LAHSA respectfully requests that the Court grant this *ex parte* application and permit LAHSA to file an Application for Preliminary Relief of approximately 16,207 words in length, or about 50 pages.

DATED: June 29, 2026

WAYMAKER LLP

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

DATED: June 29, 2026

NORTON ROSE FULBRIGHT US LLP

By: /s/ Chris Pelham
CHRIS PELHAM
Attorneys for Plaintiff
Los Angeles Homeless Services Authority

STATEMENT OF COMPLIANCE

Pursuant to L.R. 11-6.2, the undersigned, counsel of record for Plaintiff, certifies that, based on the word processing program used to prepare this memorandum of points and authorities, the memorandum of points and authorities contains 810 words (including headings, footnotes, and quotations but excluding the caption, the table of contents, the table of authorities, the signature block), which complies with the word limit of L.R. 11-6.1 (7,000 words).

DATED: June 29, 2026

WAYMAKER LLP

By: /s/ Keri Curtis Axel

KERI CURTIS AXEL

Attorneys for Plaintiff

Los Angeles Homeless Services Authority

WAYMAKER

1 Keri Curtis Axel (Bar No. 186847)
2 kaxel@waymakerlaw.com
3 Scott M. Malzahn (Bar No. 229204)
4 smalzahn@waymakerlaw.com
5 Ashley E. Martabano (Bar No. 236357)
6 amartabano@waymakerlaw.com
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10 Telephone: (424) 652-7800
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13 christopher.pelham@nortonrosefulbright.com
14 Abigail G. Urquhart (Bar No. 310547)
15 abigail.urquhart@nortonrosefulbright.com
16 Alex Scandroli (Bar No. 345278)
17 alex.scandroli@nortonrosefulbright.com
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20 Forty-First Floor
21 Los Angeles, California 90071
22 Telephone: (213) 892-9200
23 Facsimile: (213) 892-9494
24 *Attorneys for Plaintiff*
25 *Los Angeles Homeless Services Authority*

26 **UNITED STATES DISTRICT COURT**

27 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

28 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

Case No.: 2:26-cv-07056 PA (AJRx)

**DECLARATION OF KERI CURTIS
AXEL IN SUPPORT OF
PLAINTIFFS *EX PARTE*
APPLICATION TO EXCEED L.R.
11-6.1 WORD LIMIT**

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

Defendants.

WAYMAKER

DECLARATION OF KERI CURTIS AXEL

I, Keri Curtis Axel, declare as follows:

1. I am an attorney licensed to practice in the State of California. I am a partner with Waymaker LLP (“Waymaker”), counsel to plaintiff Los Angeles Homeless Services Authority (“plaintiff” or “LAHSA”) in this action. I make this Declaration in support of plaintiff’s *Ex Parte* Application to Exceed the Local Rule 11-6.1 Word Limit (the “Application for Enlarged Brief”) on plaintiff’s Application for Preliminary Relief under 5 U.S.C. § 705, for a Temporary Restraining Order, and for Preliminary Injunction (the “Application for Preliminary Relief”).

2. I have personal knowledge of the facts set forth herein and if called as a witness I could and would testify competently thereto.

3. In compliance with Local Rule 7-19.1, and this Court’s rules, on June 25, 2026, I notified the last known counsel for the U.S. Department of Housing & Urban Development (“HUD”) of the date and substance of the Application for Enlarged Brief. I also asked whether defendants intended to oppose the Application.

4. To the best of my knowledge, the last known contact information for Defendants and their counsel is as follows:

Daniel A. Beck
Acting Chief
U.S. Attorney’s Office for the Central District of California
Civil Division
300 N. Los Angeles St., 7th Floor
Los Angeles, CA 90012
Daniel.Beck@usdoj.gov

William M. Doolittle¹
Managing Attorney
U.S. Department of Housing & Urban Development
Office of Program Enforcement, Office of General Counsel
2415 Eisenhower Avenue, Room 17243

¹ These attorneys have not yet appeared as counsel of record but have held themselves out as representing HUD in discussions concerning Notices of Suspension sent to LAHSA.

Alexandria, Virginia 22314
202-402-2037 (direct)
801-367-9823 (mobile)
202-708-2350 (main)
William.M.Doolittle@hud.gov

Jessica A. Brautigam
Trial Attorney
U.S. Department of Housing & Urban Development
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Dane.M.Narode@hud.gov

Michael R. Ross
Senior Counsel
U.S. Department of Housing and Urban Development
Office of General Counsel
Michael.R.Ross@hud.gov

5. At 10:49 a.m. on June 26, I forwarded the email I sent to HUD's last known counsel to Daniel Beck, Acting Chief, Civil Division of the U.S. Attorney's Office for the Central District of California, to ensure that the Local U.S. Attorney's Office had notice of Plaintiff's intent to file the Application.

6. At 10:55 a.m., William M. Doolittle from HUD responded that HUD would oppose LAHSA's request for an enlarged brief. Mr. Doolittle requested "the opportunity to confer [on] Monday [June 29, 2026] regarding an appropriate briefing schedule for the relief you plan to seek." Shortly thereafter, I responded to Mr. Doolittle agreeing to schedule a meet-and-confer call on Monday, June 29. I also advised Mr. Doolittle that I hoped he would reconsider his position on

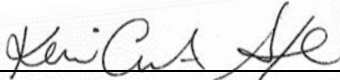
1 LAHSA's request to file an enlarged brief when he received the Application for
2 Preliminary Relief and considered the difficulty in responding in 7,000 words per
3 Local Rule 11-6.1.

4 7. The parties met and conferred on Monday, June 29, at 12:00 pm PT,
5 but did not discuss the Application for Enlarged Brief.

6 8. LAHSA's request to file an enlarged brief is warranted here because
7 the factual and legal issues presented in the Application for Preliminary Relief are
8 deeply complex and touch on homelessness funding policy—a policy of great public
9 concern and interest.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed on this 29th day of June, 2026, at Los Angeles, California.

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15 _____
16 Keri Curtis Axel
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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
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DOES 1-10,

Defendants.

Case No.: 2:26-cv-07056 PA (AJRx)

**[PROPOSED] ORDER GRANTING
PLAINTIFF LOS ANGELES
HOMELESS SERVICES
AUTHORITY'S *EX PARTE*
APPLICATION TO EXCEED
L.R. 11-6.1 WORD LIMIT ON
APPLICATION FOR
PRELIMINARY RELIEF**

Hearing Date: None Set
Hearing Time: None Set
Hon. Percy Anderson

[PROPOSED] ORDER

Having reviewed the *ex parte* application of the plaintiff Los Angeles Homeless Services Authority to exceed L.R. 11-6.1 word's limit as to its *Ex Parte* Application for Preliminary Relief Under 5 U.S.C. Section 705, for a Temporary Restraining Order, and for Preliminary Injunction (the "Application for Preliminary Relief"), and for good cause shown, the Court hereby grants the *ex parte* application. The plaintiff may file the Application for Preliminary Relief and supporting declarations forthwith.

IT IS SO ORDERED.

DATED: _____

Hon. Percy Anderson
United States District Judge