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24 *Los Angeles Homeless Services Authority*

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27 **UNITED STATES DISTRICT COURT**

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

29 LOS ANGELES HOMELESS
30 SERVICES AUTHORITY, a joint
31 powers authority,

32 Plaintiff,

33 v.

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

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

**NOTICE OF LODGING
PROPOSED ORDER TO
MAINTAIN STATUS QUO ANTE
PENDING RULING ON
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

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.

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1 On July 2, 2026, this Court ordered the parties to submit a stipulated proposed
2 order by July 16, 2026. (Dkt. 21.) On July 9, 2026, Plaintiff Los Angeles Homeless
3 Services Authority (“LAHSA”) provided a draft proposed order, and the parties met
4 and conferred on July 10, 2026. HUD replied with a revised form of order on July
5 14, 2026, to which LAHSA replied on July 15. On the morning of July 16, HUD
6 suggested that, if the parties could not agree on the form of a Stipulated Proposed
7 Order by early afternoon, that the parties submit a joint status report requesting an
8 extension of the Court’s deadline by seven days to further meet and confer. LAHSA
9 agreed in principle to this proposal, and the government agreed to take the lead in
10 preparing the status report.

11 By the time LAHSA received the draft joint status report from the
12 government later that afternoon, HUD had issued a notice revising the FY ’26
13 Notice of Funding Opportunity (“NOFO”), indicating that HUD would now permit a
14 “direct-to-HUD application process where HUD has determined that a CoC does not
15 meet the requirements of the CoC program in accordance with 24 CFR 578.13.”
16 (*See* Exhibit A). In other words, HUD modified the FY ’26 NOFO specifically as to
17 the Los Angeles CoC, to eliminate the possibility that the LA CoC submit a
18 Consolidated Application by permitting individual applications—a remedy that
19 HUD had set forth in the June 18 letter but that LAHSA was (purportedly) permitted
20 to appeal. HUD’s notice further indicated that it intended to finalize the revised
21 NOFO within 7 days (*see* Ex. A), meaning that HUD intended to finalize its NOFO
22 before the termination of meet-and-confer discussions (and therefore before the
23 Court might order it otherwise).

24 Recognizing that HUD was not agreeing to or acting to preserve the status
25 quo but, in fact, was actively changing it and attempting to finalize that change
26 before expiration of the seven-day extension that HUD had suggested for the
27 proposed order, LAHSA concluded that HUD was not acting in good faith and had
28

1 no intention of preserving the status quo, and that LAHSA should submit its own
2 proposed order. A simple form of order is attached.

3 DATED: July 17, 2026 WAYMAKER LLP

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

8 DATED: July 17, 2026 NORTON ROSE FULBRIGHT US LLP

9 By: /s/ Christopher Pelham
10 Christopher Pelham
11 *Attorneys for Plaintiff*
12 *Los Angeles Homeless Services Authority*

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EXHIBIT A

From: [SNAPS-COMPETITIONS](#)
To: SNAPS-COMPETITIONS-L@hud.gov
Subject: FY26 CoC NOFO – Notice of Intent to Modify
Date: Thursday, July 16, 2026 2:32:00 PM
Attachments: [Outlook-j50mfvi1.png](#)

SUBJECT LINE: FY26 CoC NOFO – Notice of Intent to Modify

The U.S. Department of Housing and Urban Development (HUD) has published the **FY 2026 Continuum of Care Competition and Youth Homeless Demonstration Program grants NOFO**, authorizing homeless services organizations to apply for more than \$4 billion in competitive funding to provide supportive services and housing programs for people experiencing homelessness.

On July 16, 2026, HUD provided notice of its intent to modify the FY 2026 Continuum of Care Competition and Youth Homeless Demonstration Program grants NOFO. This modification is not yet effective, but HUD intends to make it effective, via publication on grants.gov, in the next 7 days, pending further agency deliberation. HUD will notify all affected grantees and post public notice on this website.

This modification would include a direct-to-HUD application process for eligible applicants in geographic areas where HUD has determined that a CoC does not meet the requirements of the CoC program in accordance with 24 CFR 578.13. Pursuant to 24 CFR 578.13, if HUD finds a CoC for a geographic area does not meet the requirements of 42 U.S.C. 11360a, or its implementing regulations, HUD may take remedial action to ensure fair distribution of grant funds within the geographic area. This NOFO modification establishes a process for accepting and evaluating applications from eligible applicants within the geographic area in which a CoC has been found by HUD to not meet the requirements of 42 U.S.C. 11360a or its implementing regulations. For the listing of CoCs that HUD has determined do not meet the requirements of the CoC program in accordance with 24 CFR 578.13, please see below:

- CA-600

FY 2026 Application Submission Deadline: August 26, 2026, 8:00 PM ET

NOFO Materials

- NOFO link: [FY 2026 Continuum of Care Competition and Youth Homeless Demonstration Program Grants NOFO](#)
- [Preview Version of Modified FY 2026 Continuum of Care Competition and Youth Homeless Demonstration Program Grants NOFO](#)
- [Preview Version of Appendix III, Application Process and Scoring for Project Applicants in Geographic Areas in which the CoC Has Been Found by HUD to not Meet the Requirements of the Act, Under 42 U.S.C. 11360a\(c\) or its Implementing Regulations.](#)



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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 LOS ANGELES HOMELESS
13 SERVICES AUTHORITY, a joint
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18 DONALD J. TRUMP, in his official
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20 States of America; UNITED STATES
21 DEPARTMENT OF HOUSING AND
22 URBAN DEVELOPMENT; SCOTT
23 TURNER, in his official capacity as the
24 Secretary of the U.S. Department of
25 Housing and Urban Development; and
26 DOES 1-10,

27 Defendants.
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Case No.: 2:26-cv-07056 DOC (AJRx)

**[PROPOSED] ORDER TO
MAINTAIN STATUS QUO
PENDING RULING ON
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. David O. Carter

Date: August 6, 2026

Time: 9:00 a.m.

Courtroom: 1

First Street Courthouse, Los Angeles

1 This matter comes before the Court on the Noticed *Ex Parte* Application for
2 Preliminary Relief Under 5 U.S.C. § 705, For a Temporary Restraining Order, and
3 For Preliminary Injunction (the “Application”) filed by Plaintiff Los Angeles
4 Homeless Services Authority (“LAHSA”). On July 2, 2026, this Court converted the
5 Application into a Motion for a Preliminary Injunction and set a briefing schedule.
6 (Dkt. 21.) The Court, based on briefing and evidence submitted by the parties, and
7 all other matters properly considered by the Court, GRANTS a stay to maintain the
8 status quo with respect to the provision of homelessness services under 5 U.S.C.
9 § 705.

10 The Court FINDS that LAHSA has established (i) a likelihood of success on
11 the merits on its claims; (ii) a stay to preserve the status quo is necessary to prevent
12 irreparable injury pending a ruling on LAHSA’s pending Motion for a Preliminary
13 Injunction (Dkt. 24); and (iii) the balance of equities tips in LAHSA’s favor and a
14 stay is in the public interest.

15 IT IS HEREBY ORDERED that, under 5 U.S.C. § 705, all agency actions set
16 forth in the June 11 and June 18, 2026 letters from defendant U.S. Department of
17 Housing and Urban Development (“HUD”) to LAHSA are postponed and stayed
18 pending further judicial review and a ruling on LAHSA’s Motion for a Preliminary
19 Injunction. LAHSA may continue in its provision of homeless services.

20
21 **IT IS SO ORDERED.**

22
23 DATED: _____

24 _____
25 Honorable David O. Carter
26 United States District Judge
27
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