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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

LOS ANGELES HOMELESS
SERVICES AUTHORITY,

Plaintiff,

v.

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

Defendants.

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

**DEFENDANTS' OBJECTION TO
PLAINTIFF'S [PROPOSED] ORDER
TO MAINTAIN STATUS QUO ANTE
PENDING RULING ON PLAINTIFF'S
MOTION FOR PRELIMINARY
INJUNCTION [ECF NO. 27-2]**

Honorable David O. Carter
United States District Judge

1 Defendants object to the Plaintiff's Proposed Order, ECF No. 27-2.

2 On July 16, 2026, Defendants sought a seven-day extension of the time to file a
3 stipulated proposed order to provide additional time for the parties to find common
4 ground. Regrettably, Plaintiff dismissed that invitation for further negotiation in favor of
5 a unilateral filing. Plaintiff now baselessly accuses Defendants of seeking the extension
6 so that they can issue a Notice of Funding Opportunity (NOFO) in advance of any
7 stipulated order. Plaintiff's accusation presumes that Defendants are *required* to "agree"
8 to enjoin themselves from issuing a revised NOFO and following the course outlined in
9 the June 18 Letter. That presumption is unfounded. As explained in the Status Report,
10 the Court's Minute Order begins by explaining that injunctive relief is inappropriate in
11 advance of the preliminary injunction hearing. ECF No. 21 at 1. Plaintiff would
12 interpret the Court to have then, on the next page, granted them a TRO by another name
13 as a "*Stipulated Proposed Order*," without analyzing the ordinary factors in *Winter v.*
14 *Nat. Res. Def. Council, Inc.*, 555 U.S. 7 (2008). That reading is unreasonable.

15 In any event, the Court should deny Plaintiff any preliminary relief, including
16 Plaintiff's proposed Section 705 stay, for the reasons explained in Defendants'
17 opposition to the motion for a preliminary injunction, ECF No. 25. *See Immigrant Defs.*
18 *L. Ctr. v. Noem*, 145 F.4th 972, 983-84 (9th Cir. 2025) (noting that "'stays' under the
19 APA turn on the same factors as preliminary injunctions"). Plaintiff is not likely to
20 succeed on the merits and has not met its burden to show that, absent relief, it will suffer
21 irreparable harm that outweighs Defendants' equities and the public interest. *See* ECF
22 No. 25, at 10-33.

23 Seeking to supplement its argument on irreparable harm, Plaintiff suggests that if
24 HUD finalizes the NOFO on July 26, that would "eliminate the possibility that the LA
25 CoC submit a Consolidated Application" in favor of "permitting individual
26 applications." ECF No. 27 at 3; *but see* 42 U.S.C. § 11360a(c) (contemplating HUD
27 taking this exact action). That, again, begs the question why Plaintiff waited weeks after
28 the June 11 Letter to seek relief. It also dramatically discounts Defendants' and the

1 public's interests in working to finalize the FY2026 NOFO, which sets the rules for a \$4
2 billion nationwide competition.

3 In any event, Plaintiff is mistaken that the publication of the modified NOFO
4 described in the July 16, 2026, Notice of Intent to Modify, ECF No. 31-7, will absolutely
5 foreclose LAHSA from running the CoC competition for the LA geographic area. To
6 the contrary, HUD has decided to do its best to maintain the status quo by delaying until
7 August 10, 2026, or until this Court rules on Plaintiff's application for a preliminary
8 injunction, whichever is earliest, a final determination on its June 18 letter and whether
9 the LA CoC will be subject to the alternative processes described in the modified NOFO
10 and Appendix III thereto.¹ HUD will similarly extend the application deadline for
11 eligible applicants in the LA CoC's geographic area to thirty (30) days after the date of
12 HUD's determination whether the LA CoC (or CA-600) meets the statutory and
13 regulatory requirements described in the June 18 Letter. For example, if HUD makes its
14 determination on August 10, eligible applicants in the geographic area will have until
15 September 9 to apply for the competition. As a result, this delay will not prejudice the
16 LA CoC nor the individual applicants.

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26 ¹ To ensure proper notice to potential applicants, HUD will issue a revised Notice of
27 Intent to Modify, to supersede the notice at ECF No. 31-7. The revised notice will
28 remove any specific reference to CA-600 and will provide a link to a website identifying
potentially affected CoCs that can be updated at the relevant time.

1 Dated: July 21, 2026

Respectfully submitted,

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