

ROB BONTA
 Attorney General of California
 MICHAEL L. NEWMAN
 Senior Assistant Attorney General
 JOEL MARRERO
 Supervising Deputy Attorney General
 HEIDI JOYA
 LAUREN GREENAWALT
 JONATHAN BENNER
 ALEX FLORES
 JARRELL E. MITCHELL
 Deputy Attorneys General
 State Bar No. 305055
 300 South Spring Street
 Los Angeles, CA 90013
 Telephone: (213) 269-6562
 E-mail: Jarrell.Mitchell@doj.ca.gov
Attorneys for Plaintiff State of California
Additional Counsel Listed on Signature Page

BRETT A. SHUMATE
 Assistant Attorney General
 DIANE KELLEHER
 Branch Director
 STEVEN M. CHASIN
 D.C. BAR # 495853
 Trial Attorney, U.S. Department of
 Justice
 Civil Division, Federal Programs
 Branch
 1100 L Street, N.W.
 Washington, DC 20005
 Telephone: (202) 305-0747
 Email: Steven.m.chasin2@usdoj.gov
Counsel for Defendants

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

STATE OF ILLINOIS; STATE OF CALIFORNIA;
 DISTRICT OF COLUMBIA; STATE OF
 ARIZONA; STATE OF COLORADO; STATE OF
 CONNECTICUT; STATE OF DELAWARE;
 STATE OF HAWAII; STATE OF MAINE;
 STATE OF MARYLAND; COMMONWEALTH
 OF MASSACHUSETTS; STATE OF MICHIGAN;
 STATE OF NEW JERSEY; STATE OF RHODE
 ISLAND; STATE OF VERMONT;
 COMMONWEALTH OF VIRGINIA; AND STATE
 OF WASHINGTON,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOUSING
 AND URBAN DEVELOPMENT; ERIC SCOTT
 TURNER, in his official capacity as Secretary of the
 U.S. Department of Housing and Urban
 Development; CRAIG TRAINOR, in his official
 capacity as Assistant Secretary for the Office of Fair
 Housing and Equal Opportunity; and the UNITED
 STATES OF AMERICA,

Defendants.

Case No. 3:26-cv-02262-VC

**JOINT STIPULATION FOR
 DISMISSAL WITHOUT PREJUDICE**

Assigned to the Hon. Vince Chhabria

Case Filed: March 16, 2026

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs State of Illinois,
2 State of California, State of Arizona, State of Colorado, State of Connecticut, State of Delaware,
3 State of Hawai'i, State of Maine, State of Maryland, Commonwealth of Massachusetts, State of
4 Michigan, State of New Jersey, State of Rhode Island, State of Vermont, Commonwealth of
5 Virginia, State of Washington, and the District of Columbia ("Plaintiffs"); and Defendants United
6 States Department of Housing and Urban Development ("HUD"), Eric Scott Turner, in his
7 official capacity as Secretary of the United States Department of Housing and Urban
8 Development, Craig Trainor, in his official capacity as Assistant Secretary for the Office of Fair
9 Housing and Equal Opportunity, and the United States of America ("Defendants") (collectively,
10 the "Parties") stipulate to dismiss Plaintiffs' First Amended Complaint for the reasons set forth in
11 the recitals below.

12 WHEREAS, Plaintiffs filed this lawsuit on March 16, 2026, concerning the Fair Housing
13 Assistance Program, administered by Defendant HUD, and on June 24, 2026, Plaintiffs filed their
14 First Amended Complaint, and on July 22, 2026, Defendants filed their Motion to Dismiss the
15 First Amended Complaint (ECF No. 88); and

16 WHEREAS, during that motion practice, the Parties discussed various aspects of HUD's
17 administration of the Fair Housing Assistance Program, and as a result of those discussions,
18 HUD, through its undersigned counsel, has sent Plaintiffs a letter, dated September 2, 2026,
19 reflecting the matters that arose during the briefing and that the Parties discussed; and, based on
20 the foregoing, at this time, Plaintiffs have determined to dismiss the First Amended Complaint
21 without prejudice;

22 NOW THEREFORE, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii),
23 Plaintiffs and Defendants jointly stipulate that any claims asserted by Plaintiffs against
24 Defendants in this action be dismissed without prejudice. The parties further stipulate that each
25 party shall bear its own costs and attorneys' fees.

Dated: September 2, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

ROB BONTA
Attorney General of California
MICHAEL L. NEWMAN
Senior Assistant Attorney General
JOEL MARRERO
Supervising Deputy Attorney General
HEIDI JOYA
LAUREN GREENAWALT
JONATHAN BENNER
ALEX FLORES

DIANE KELLEHER
Branch Director
Federal Programs Branch

/s/ Steven M. Chasin
STEVEN M. CHASIN
D.C. Bar # 495853
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, DC 20005
Telephone: (202) 305-0747
E-mail: Steven.m.chasin2@usdoj.gov

/s/ Jarrell E. Mitchell
JARRELL E. MITCHELL
Deputy Attorneys General
Attorneys for Plaintiff State of California

Counsel for Defendants

KWAME RAOUL
Attorney General of Illinois

BRIAN L. SCHWALB
Attorney General of the District of Columbia

/s/ Paul Berks
CARA HENDRICKSON*
Executive Deputy Attorney General
PAUL BERKS*
Complex Litigation Counsel
GRETCHEN HELFRICH*
Deputy Chief, Special Litigation Bureau
KATHERINE PANNELLA*
Senior Assistant Attorney General
MARY ROSENBERG*
Assistant Attorney General
Office of the Illinois Attorney General
115 S. LaSalle St., Chicago, IL 60603
(773) 919-2923
Paul.Berks@ilag.gov
Cara.Hendrickson@ilag.gov
Katherine.Pannella@ilag.gov
Mary.Rosenberg@ilag.gov
Attorneys for Plaintiff State of Illinois

/s/ Nicole S. Hill
ELIZA H. SIMON
Senior Counsel to the Attorney General
NICOLE S. HILL*
Assistant Attorney General
Office of the Attorney General
of the District of Columbia
400 Sixth Street NW
Washington, D.C. 20001
(202) 727-4171
Nicole.Hill@dc.gov
Attorneys for Plaintiff District of Columbia

KRISTIN K. MAYES
Attorney General of the State of Arizona

PHILIP J. WEISER
Attorney General of Colorado

/s/ Syreeta A. Tyrell
HAYLEIGH S. CRAWFORD*
Deputy Solicitor General
SYREETA A. TYRELL*
Senior Litigation Counsel
JOSH LEFKOW
Assistant Attorney General
2005 North Central Avenue
Phoenix, Arizona 85004
Phone: (602) 542-3333
Hayleigh.Crawford@azag.gov
Syreeta.Tyrell@azag.gov
ACL@azag.gov
Attorneys for Plaintiff State of Arizona

/s/ Kristopher Brambila
KRISTOPHER BRAMBILA*
Senior Assistant Attorney General
Colorado Department of Law
1300 Broadway, #10
Denver, CO 80203
(720) 508-6000
kristopher.brambila@coag.gov
Attorneys for Plaintiff State of Colorado

WILLIAM TONG
Attorney General of Connecticut

KATHLEEN JENNINGS
Attorney General of the State of Delaware

/s/ Laura Thurston
LAURA THURSTON*
Assistant Attorney General
165 Capitol Ave
Hartford, CT 06106
(860) 808-5210
Laura.Thurston@ct.gov
Attorneys for Plaintiff State of Connecticut

/s/ Ian R. Liston
IAN R. LISTON*
Director of Impact Litigation
ROSE E. GIBSON
VANESSA L. KASSAB
Deputy Attorneys General
Delaware Department of Justice
820 N. French Street
Wilmington, DE 19801
(302) 683-8899
ian.liston@delaware.gov
Attorneys for Plaintiff State of Delaware

ANNE E. LOPEZ
Attorney General for the State of Hawai'i

AARON M. FREY
Attorney General of Maine

/s/ Kaliko 'onālani D. Fernandes
KALIKO'ONĀLANI D. FERNANDES*
Solicitor General
425 Queen Street
Honolulu, HI 96813
(808) 586-1360
david.d.day@hawaii.gov
kaliko.d.fernandes@hawaii.gov
Attorneys for Plaintiff State of Hawai'i

/s/ Katherine W. Thompson
KATHERINE W. THOMPSON*
Special Counsel
Office of the Attorney General
6 State House Station
Augusta, ME 04333
Tel.: 207-626-8455
Fax: 207-287-3145
Kate.thompson@maine.gov
Attorneys for Plaintiff State of Maine

ANTHONY G. BROWN
Attorney General of Maryland

/s/ Yasmin Dagne
YASMIN DAGNE*
Assistant Attorney General
Office of the Attorney General
200 Saint Paul Place, 20th Floor
Baltimore, Maryland 21202
410-223-1580
ydagne@oag.maryland.gov
Attorneys for Plaintiff State of Maryland

DANA NESSEL
Attorney General of Michigan

/s/ Neil Giovanatti
NEIL GIOVANATTI*
Assistant Attorney General
Michigan Department of Attorney General
P.O. Box 30212
Lansing, MI 48909
(517) 335-7622
GiovanattiN@michigan.gov
Attorney for Plaintiff State of Michigan

PETER F. NERONHA
Attorney General for the State of Rhode Island

/s/ Kyla Duffy
KYLA DUFFY (RI Bar No. 10897)*
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
(401) 274-4400
kduffy@riag.ri.gov
Attorneys for Plaintiff State of Rhode Island

ANDREA JOY CAMPBELL
Attorney General of Massachusetts

/s/ Nita K. Klunder
NITA K. KLUNDER (BBO No. 689304)*
State Trial Counsel
SAV ARGUELLO*
Assistant Attorney General (BBO No. 710710)
One Ashburton Place, 20th Floor
Boston, MA 02108
(617) 963-2394
nita.klunder@mass.gov
Attorneys for Plaintiff Commonwealth of Massachusetts

JENNIFER DAVENPORT
Attorney General of New Jersey

/s/ Farng-Yi D. Foo
FARNG-YI D. FOO*
MICHELLE KOSTYACK*
Deputy Attorneys General
Office of the Attorney General
124 Halsey Street, 5th Floor
Newark, NJ 07101
(609) 696-5365
Farng-Yi.Foo@law.njoag.gov
Michelle.Kostyack@law.njoag.gov
Attorneys for Plaintiff State of New Jersey

CHARITY R. CLARK
Attorney General of Vermont

/s/ Julio A. Thompson
JONATHAN T. ROSE
Solicitor General
JULIO A. THOMPSON*
Co-Director, Civil Rights Unit
109 State Street
Montpelier, VT 06509
(802) 828-3171
Julio.thompson@vermont.gov
Attorneys for Plaintiff State of Vermont

1 **JAY JONES**
Attorney General of Virginia

NICHOLAS W. BROWN
Attorney General of Washington

2
3 /s/ Megan C. Keenan
MEGAN C. KEENAN**
4 Deputy Solicitor General
202 North 9th Street
5 Richmond, Virginia 23219
(804) 997-5222
6 mkeenan@oag.state.va.us
7 *Attorneys for Plaintiff Commonwealth of Virginia*

/s/ Daniel J. Jeon
DANIEL J. JEON*
Assistant Attorney General
Civil Rights Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
206-464-7744
Daniel.jeon@atg.wa.gov
Attorneys for Plaintiff State of Washington

8 **Admitted pro hac vice*

9 *** Pro hac vice application forthcoming*