

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF WASHINGTON, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT, *et al.*,

Defendants.

AND

NATIONAL ALLIANCE TO END  
HOMELESSNESS, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT, *et al.*,

Defendants.

Case Nos. 25-cv-626-MSM-AEM  
25-cv-636-MSM-AEM

District Judge Mary S. McElroy  
Magistrate Judge Amy E. Moses

**JOINT MOTION FOR AN EXTENSION OF TIME TO NOTIFY  
RECIPIENTS OF RENEWAL STEPS**

In these two related cases, the Court by written order on December 23, 2025, required Defendants to “inform recipients” within fourteen days of the order “of any steps they must take in order for eligible renewals” under the FY2024-2025 HUD Continuum of Care Notice of Funding Opportunity “to be processed” and to “promptly file a notice confirming such communications were made.” Order at 3, *State of Washington et al. v. HUD*, 25-cv-626 [hereinafter “*State Litigation*”], ECF No. 68; Order at 3, *National Alliance to End Homelessness, et al. v. HUD*, 25-cv-636 [hereinafter “*NAEH Litigation*”], ECF No. 52 (collectively “PI Order”). That notice to recipients is thus currently due by January 6, 2026. *See* PI Order at 3.

The parties have conferred regarding the Implementation Plan filed in this case, *NAEH Litigation*, ECF No. 58-1; *State Litigation*, ECF No. 74-1, and the parties anticipate revisions to that plan based on these conferrals. The parties have also conferred regarding the substance of the forthcoming notice to recipients, and Defendants will share a draft of that notice with Plaintiffs by noon today. To allow Plaintiffs time to review that draft and for the parties to further confer over the content and form of that notice, if necessary, the parties request that the Court extend the time to inform recipients of the steps they must take for eligible renewals to be processed to January 8, 2026. Good cause exists because such an extension may permit the parties to come to an agreement on the language necessary to include in Defendants’ notice without seeking this Court’s intervention.

DATE: January 6, 2026

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on January 6, 2026, the above document was filed with the CM/ECF filing system.

/s/ William S. Jankowski