

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

STATE OF NEW YORK; STATE OF
WASHINGTON; STATE OF RHODE ISLAND;
STATE OF ARIZONA; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE OF
CONNECTICUT; DISTRICT OF COLUMBIA;
STATE OF HAWAII; STATE OF ILLINOIS;
STATE OF MAINE; STATE OF MARYLAND;
COMMONWEALTH OF MASSACHUSETTS;
STATE OF MICHIGAN; STATE OF
MINNESOTA; STATE OF NEVADA; STATE OF
NEW JERSEY; STATE OF NEW MEXICO;
STATE OF OREGON; STATE OF VERMONT;
STATE OF WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE; PAMELA
BONDI, in her official capacity as ATTORNEY
GENERAL OF THE UNITED STATES; U.S.
DEPARTMENT OF HEALTH AND HUMAN
SERVICES; ROBERT F. KENNEDY, JR., in his
official capacity as SECRETARY OF THE U.S.
DEPARTMENT OF HEALTH AND HUMAN
SERVICES; U.S. DEPARTMENT OF
EDUCATION; LINDA McMAHON, in her official
capacity as SECRETARY OF THE U.S.
DEPARTMENT OF EDUCATION; U.S.
DEPARTMENT OF LABOR; LORI CHAVEZ-
DeREMÉR, in her official capacity as
SECRETARY OF THE U.S. DEPARTMENT OF
LABOR,

Defendants.

Case No. 1:25-cv-00345

**STIPULATION AND JOINT
PROPOSAL FOR BRIEFING
SCHEDULE**

STIPULATION

1. Defendants agree to stay enforcement and application in Plaintiff States¹ through September 10, 2025, of the challenged Notices (and their contents) as set forth below:

- a. U.S. Department of Justice, “Revised Specification Pursuant to the Personal Responsibility and Work Opportunity Reconciliation Act of 1996,” 90 Fed. Reg. 32,023 (July 16, 2025);
- b. U.S. Department of Health and Human Services, “Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of ‘Federal Public Benefit,’” 90 Fed. Reg. 31,232 (July 14, 2025);
- c. U.S. Department of Education, “Clarification of Federal Public Benefits under the Personal Responsibility and Work Opportunity Reconciliation Act,” 90 Fed. Reg. 30,896 (July 11, 2025); and
- d. U.S. Department of Labor, “Training and Employment Guidance Letter No. 10-23, Change 2” (July 10, 2025).

2. Defendants agree that, regardless of the outcome of this litigation, including on any appeal, they will never enforce or in any way apply the PRWORA Notices listed in paragraph 1, including the interpretations of PRWORA expressed in those Notices, related to:

- a. conduct occurring in Plaintiff States prior to September 11, 2025;
- b. funds expended in Plaintiff States prior to September 11, 2025; or
- c. any other actions taken in reliance on this Stipulation prior to September 11, 2025.

¹ The term States includes the States and their subdivisions and instrumentalities.

JOINT PROPOSAL FOR BRIEFING SCHEDULE

The parties respectfully request that the Court enter the following schedule with respect to Plaintiffs' July 21, 2025 Preliminary Injunction Motion, ECF No. 2:

Defendants' Opposition Due: August 11, 2025

Plaintiffs' Reply Due: August 18, 2025

Argument: August 20, 2025, or as soon thereafter as the Court is available.

Dated: July 29, 2025

Respectfully submitted,

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