

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

NATIONAL FAIR HOUSING
ALLIANCE, *et al.*,

Plaintiffs,

v.

BEN CARSON, *et al.*,

Defendants.

Civ. Action No. _____

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION AND
FOR EXPEDITED SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs hereby move the Court for a preliminary injunction ordering Defendants to rescind their January 5, 2018 delay and suspension of the requirements of the Affirmatively Furthering Fair Housing (AFFH) Rule and take all other necessary steps to ensure implementation of the AFFH Rule on the schedule that was in place before that action.

In addition, pursuant to Federal Rule of Civil Procedure 56, Plaintiffs hereby move for expedited summary judgment on the grounds that there is no genuine issue of disputed material fact and that they are entitled to judgment as a matter of law. Plaintiffs respectfully request expedited consideration of this portion of the combined Motion.

In support of this combined Motion, Plaintiffs submit the accompanying (1) memorandum; (2) declarations of National Fair Housing Alliance's (NFHA) President and Chief Executive Officer Lisa Rice, NFHA's Vice President for Housing Policy and Special Projects Debby Goldberg, the Texas Low Income Housing Information Service's Co-Director John Henneberger, Texas Appleseed's Director of the Disaster Recovery and Fair Housing Project Madison Sloan, the National Law Center on Homelessness & Poverty's

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Deputy Director Janet Hostetler, Professor Justin Steil of the Massachusetts Institute of
Technology's Department of Urban Studies & Planning, the Greater New Orleans Fair
Housing Action Center's Director of Policy & Communications Maxwell Ciardullo, and
the Public Interest Law Center of Philadelphia's Staff Attorney Dan Urevick-Ackelsberg;
and (3) a proposed order.

Dated: May 8, 2018

Respectfully Submitted,

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