

**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. 1:18-cv-1076-BAH

**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 (1) rescind their May 23, 2018 Notices that withdrew the Assessment Tool for Local Governments and instructed local jurisdictions not to comply with the requirements of the Affirmatively Furthering Fair Housing (AFFH) Rule; (2) reinstate the Assessment Tool for Local Governments; and (3) take all other necessary steps to ensure prompt implementation of the AFFH Rule.

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 of law; (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 Deborah 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 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, the Public Interest Law Center of Philadelphia's Staff Attorney Daniel Urevick-Ackelsberg, and the Mid-America Regional Council's Director of Research Services Franklin A. Lenk; and (3) a proposed order.

Dated: May 29, 2018

Respectfully Submitted,

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