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*Counsel for Plaintiff State of Washington*

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

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

No. 6:25-cv-01748-AA

SECOND DECLARATION OF  
LUCY WOLF

I, Lucy Wolf, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am an Assistant Attorney General with the Washington State Office of the Attorney General and one of the attorneys representing Plaintiff State of Washington in the above-captioned matter.

3. On January 9, 2026, PREP State Grantees received an email from Cheri Thompson at ACF seeking a Letter of Intent to request FY 2026 PREP funding. A true and correct copy of this email correspondence is attached as **Exhibit A**. That email attached Supplemental Terms and

Conditions effective October 1, 2025, containing language identical to the enjoined Supplemental Terms and Conditions per the Court’s October 27, 2025, Order. *See* Opinion and Order Page 76. A true and correct copy of the October 1, 2025, PREP Supplemental Terms and Conditions is attached as **Exhibit B**.

4. On January 11, 2026, I emailed counsel for Defendants to inform them of Defendants’ non-compliance with this Court’s injunction and to request they ask Defendants to come into compliance with the terms of the injunction. A true and correct copy of this email correspondence is attached as **Exhibit C**.

5. On January 12, 2026, counsel for Defendants responded, stating that the inclusion of the enjoined language in the Supplemental Terms and Conditions was an “oversight” and that “ACF plans to send an email to state grantees explaining the above, reminding them of the PI, clarifying that states are not bound by the gender ideology clause while the PI is in place, and confirming that inclusion of paragraph 5 was an oversight.” A true and correct copy of this email correspondence is attached as **Exhibit D**.

6. On January 30, 2026, State Grantees received 2026 PREP and SRAE NOAs that included the enjoined “gender ideology” language (“Recipients are prohibited from including gender ideology in any program or service that is funded with this award...”). The 2026 PREP and SRAE NOAs also link to the 2025 Terms and Conditions, which included the enjoined language. A true and correct copy of the January 30, 2026, PREP NOA for Washington is attached as **Exhibit E**. A true and correct copy of the January 30, 2026, SRAE NOA for Wisconsin is attached as **Exhibit F**. A true and correct copy of the October 1, 2025, SRAE Supplemental Terms and Conditions is attached as **Exhibit G**.

7. On February 6, 2026, I emailed counsel for Defendants to inform them of Defendants’ additional non-compliance with this Court’s injunction and to request they ask Defendants to again come into compliance with the terms of the injunction by withdrawing and reissuing the PREP and SRAE NOAs without the enjoined language and with links to the updated

2026 Supplemental Terms and Conditions. A true and correct copy of this email correspondence is attached as **Exhibit H**.

8. On February 9, 2026, counsel for Defendants responded, stating that the PREP and SRAE NOAs and Supplemental Terms and Conditions “inadvertently included the gender ideology condition.” Counsel promised that Defendants would remove the enjoined language from the PREP and SRAE NOAs, re-issue the NOAs, and send an email to Plaintiff States that the 2026 Terms and Conditions are “still forthcoming” and will not include enjoined language. A true and correct copy of this email correspondence is attached as **Exhibit I**.

9. On February 10, 2026, Defendants re-issued the PREP and SRAE NOAs. A true and correct copy of the February 10, 2026, Revised PREP NOA for Washington is attached as **Exhibit J**. A true and correct copy of February 10, 2026, Revised SRAE NOA for Oregon is attached as **Exhibit K**. The re-issued NOAs state, “In accordance with the preliminary injunction issued in *Washington et al. v. HHS* (D. Or.), this NOA has been revised to remove the Additional Term and Condition at Paragraph 5 of the Supplemental Terms and Conditions, prohibiting inclusion of gender ideology in any program or services funded with this award, which was included in the prior NOA. This Supplemental Term and Condition will not be applied to your program while the injunction remains in place and including it in the previous NOA issued on January 30 was an oversight on ACF’s part.”

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED and SIGNED this 20th day of February 2026, at Seattle, Washington.

s/ Lucy Wolf  
LUCY WOLF, WSBA #59028  
Assistant Attorney General

# Exhibit A

**From:** [Wolf, Lucy \(ATG\)](#)  
**To:** [Johnson, Victoria \(ATG\)](#)  
**Subject:** FW: State PREP FY2026 Letter of Intent (LOI)  
**Date:** Tuesday, February 10, 2026 11:47:07 AM  
**Attachments:** [image001.png](#)  
[Request for OLDC Access .doc](#)  
[2026 PREP Estimated Allocation.pdf](#)  
[FY25 FYSB State PREP Supplemental Terms and Conditions .pdf](#)  
[Retrieving documents from OLDC.pdf](#)  
**Importance:** High

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**From:** Thompson, Cheri (ACF) <[Cheri.Thompson@acf.hhs.gov](mailto:Cheri.Thompson@acf.hhs.gov)>  
**Sent:** Friday, January 9, 2026 12:10 PM  
**To:** Clardy, Laraine (DOH) <[Laraine.Clardy@doh.wa.gov](mailto:Laraine.Clardy@doh.wa.gov)>; Samples, Mary J (DOH) <[Mary.Samples@doh.wa.gov](mailto:Mary.Samples@doh.wa.gov)>; Hohney, Julie <[jhohney@pa.gov](mailto:jhohney@pa.gov)>; Martin, Tiffany <[tiffmartin@pa.gov](mailto:tiffmartin@pa.gov)>; Lindsay Weaver <[lindsay.weaver@oha.oregon.gov](mailto:lindsay.weaver@oha.oregon.gov)>; Schollaert Daniel <[daniel.schollaert@oha.oregon.gov](mailto:daniel.schollaert@oha.oregon.gov)>; Kimberly Deleon Guerrero <[kimberly.deleonguerrero@cnmipss.org](mailto:kimberly.deleonguerrero@cnmipss.org)>; [kimberly.camacho@cnmipss.org](mailto:kimberly.camacho@cnmipss.org); Johns, Lakeesha (DHSS) <[lakeesha.johns@delaware.gov](mailto:lakeesha.johns@delaware.gov)>; [hannah.guzzi@alaska.gov](mailto:hannah.guzzi@alaska.gov); Cellini J. Higa <[cjhiga@gdoe.net](mailto:cjhiga@gdoe.net)>; Suzuki, Brandon <[brandon.suzuki@doh.hawaii.gov](mailto:brandon.suzuki@doh.hawaii.gov)>; [emily.mcdowell@state.mn.us](mailto:emily.mcdowell@state.mn.us); [samantha.ritter@maryland.gov](mailto:samantha.ritter@maryland.gov); Gosselin, Kimberly <[kimberly.gosselin@maine.gov](mailto:kimberly.gosselin@maine.gov)>; Anna Limeburner <[alimeburner@mainefamilyplanning.org](mailto:alimeburner@mainefamilyplanning.org)>; Montag, Naomi <[naomi.montag@maine.gov](mailto:naomi.montag@maine.gov)>; LaFlamme, Stacey <[stacey.laflamme@maine.gov](mailto:stacey.laflamme@maine.gov)>; Lynette Johnson <[ljohnson@mainefamilyplanning.org](mailto:ljohnson@mainefamilyplanning.org)>; [kaitlyn.traub@state.mn.us](mailto:kaitlyn.traub@state.mn.us); [kristin.teipel@state.mn.us](mailto:kristin.teipel@state.mn.us); [julie.neitzelcarr@state.mn.us](mailto:julie.neitzelcarr@state.mn.us); [mariah.geiger-williams@state.mn.us](mailto:mariah.geiger-williams@state.mn.us); [victoria.paniagua@maryland.gov](mailto:victoria.paniagua@maryland.gov); Niles, Madison <[madison.niles@doh.hawaii.gov](mailto:madison.niles@doh.hawaii.gov)>; [Chantelle.Archer@ct.gov](mailto:Chantelle.Archer@ct.gov); McCarthy, Tina <[tina.mccarthy@ct.gov](mailto:tina.mccarthy@ct.gov)>; [Marc.Camardo@ct.gov](mailto:Marc.Camardo@ct.gov); [rebekah.morisse@alaska.gov](mailto:rebekah.morisse@alaska.gov)  
**Subject:** State PREP FY2026 Letter of Intent (LOI)

External Email

Dear State Personal Responsibility Education Program (State PREP) Grant Recipients,  
**PLEASE CONFIRM RECEIPT**

Happy New Year! We hope that you and your staff are well. We are pleased to announce that under the current continuing resolution (*Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026. Bill number: H.R. 5371*) that was passed on November 12, 2025, a portion of the annual funding for FY 2026 is available to states and territories that intend to request their state allotments for the State Personal Responsibility Education Program (State PREP). The remaining balance will be awarded at a later date and subject to the availability of funds. Attached to this email is a list of allotments for each eligible state and territory under the continuing resolution.

**Grant recipients are to submit a Letter of Intent (LOI) to their Federal Project Officer**

**(FPO) to request FY 2026 funding by Tuesday, January 13, 2026 and the letter must adhere to the following requirements:**

1. Submission on agency letterhead;
2. Signed by the authorized representative; and,
3. Indicate the award amount based upon the attached State PREP allotment chart.

**In addition, the documents listed below are components of the LOI and are to be submitted in the Online Data Collection System (OLDC) by Friday, January 23, 2026.**

1. Application for Federal Assistance - SF-424 Mandatory (SF-424M);
2. Budget Information for Non-Construction Programs SF-424A;
3. Itemized Budget (using the *allotment* in the attachment and cost categories outlined in the SF-424A);
4. Budget Narrative (based upon the *allotment*);
5. Description of any programmatic changes that impact implementation of the project, if applicable; and
6. State Plan to include the sub-award plan, target population, anticipated number of youth served per implementation site, proposed curriculum, and plan to address at least three Adulthood Preparation Subjects (APS). Detailed state plan. It is recommended to include the following elements in the state plan:
  - a. Proposed geographic service areas
  - b. Target population
  - c. Estimate number of youth to be served throughout the project period
  - d. Proposed curriculum
  - e. Implementation settings
  - f. Plan to address at least three Adulthood Preparation Subjects (APS)
  - g. Sub-recipient plan
    - a. Implementation Plan
    - b. Goals and Objectives
    - c. Whether or not your program agrees to implement selected curriculum with fidelity
    - d. Confirmation of formal training in the program model (or plans to do so)
    - e. Teach risk avoidance skills through methods that do not normalize teen sexual activity
    - f. Positive Youth Development Approach
    - g. Plan to address at least three Adulthood Preparation Subjects (APS)
    - h. Trauma Informed Approach
      - i. Medically accurate and Age Appropriate
      - j. Agree to Collect and Report Performance Measures
      - k. Agree to Participate in National Evaluation (as required)
      - l. Linkage to Referral Sources
    - m. Sustainability Plan
  - h. Plan for local evaluation, as necessary

**The process for submitting an LOI packet is as follows:**

Mandatory grant recipients are required to use the [OnLine Data Collecton \(OLDC\)](#) to submit the SF-424M that reflects the full allocation and upload all other documents listed above. If grant recipients are having trouble submitting the LOI packet in OLDC, the grant

recipient can email the specified documents to their FPO. The federal forms are available to grant recipients at <https://www.grants.gov/forms/forms-repository/sf-424-mandatory-family> .

Grant recipients are to use their assigned User Id and password, to access OLDC and upload the LOI documents according to the below instructions:

1. Sign into OLDC
2. On the left side of the page, click on "Report Form Entry"
3. In the Drop-down list select the "Program Name"
4. Select the Grantee Name
5. Select the SF-424-M.
6. Once the form is open by clicking the + sign
7. The application for Federal Assistance SF-424-M is self-explanatory
8. The grantee will have the capability to View/Add Attachments and save the information
9. The Program Office, once the information in the SF-424-M is completed, should Validate the form.

For states that do not have the required credentials to access OLDC, the **attached form** should be completed and submitted to [app\\_support@acf.hh.gov](mailto:app_support@acf.hh.gov) to obtain a username and password.

The Letter of Intent is to be sent to your FPO via email by **January 13, 2026**. In addition, the LOI packet is to be submitted via OLDC by **January 23, 2026**, based upon the allotment under the current continuing resolution in the attached chart and the awards are anticipated to be made by the end January 2026. Please feel free to contact me at FPO email address should you have questions or concerns regarding document submission by the deadline.

Attachments: FY 2026 State PREP Allotments  
State PREP Terms and Conditions  
Request Access to OLDC

\* All Terms & Conditions will be updated and reissued as needed.

Best,



**Ms. Chéri Thompson**

**Program Specialist**

Division of Positive Youth Development (DPYD)

Family and Youth Services Bureau

Administration for Children and Families

Office Phone: 202-205-8173

Help us achieve **A Home for Every Child.**

Learn more about fostering [here](#).

# Exhibit B



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

**Federal Fiscal Year 2025**

**SUPPLEMENTAL TERMS and CONDITIONS**

The **General Terms and Conditions** apply to all non-discretionary programs. These Supplemental Terms and Conditions (T&Cs) are additional requirements applicable to the program named below.

By acceptance of awards for this program, the recipient agrees to comply with the requirements included in both the General and Supplemental Terms and Conditions for this program.

**Administration on Children, Youth, and Families (ACYF)  
Family and Youth Services Bureau (FYSB)**

**State Personal Responsibility Education Program (PREP)**

Assistance Listing No. 93.092

**EFFECTIVE PERIOD**

The supplemental T&Cs are effective on the date shown in the footer at the bottom of the respective pages and applies to awards and award modifications that add funding which are issued on or after that date (including any supplements to awards and competing and non-competing continuation awards). For recipients of such awards, the T&Cs supersede all previous similar T&Cs and will remain in effect until updated for subsequent awards. All T&Cs will be updated and reissued as needed.

**APPLICABLE LEGISLATION, STATUTE, REGULATIONS**

1. The administration of this program is authorized under Title V, [Section 513](#), of the Social Security Act (the Act).
2. The program is codified at [42 U.S.C. §713](#).
3. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards located under 2 CFR Parts [200](#) and [300](#)). In accordance with 2 CFR §200.101, Applicability, this program must comply with 2 CFR 200 in its entirety. No exceptions were identified.
4. Additional applicable regulations and requirements can be found in the [ACF Standard Terms and Conditions](#).

**ADDITIONAL TERM AND CONDITION**

5. Recipients are prohibited from including gender ideology in any program or service that is funded with this award. The statutory authority for the PREP program under which this grant has been awarded, at 42 U.S.C. §713, does not authorize teaching students that gender identity is distinct from biological sex or boys can identify as girls and vice versa, or that there is a vast spectrum of genders that are disconnected from one's sex. Therefore, gender ideology is outside of the scope of the statutory authority for this award. In addition, any costs associated with gender ideology are not allowable expenditures of federal grant funds or maintenance-of -effort funds for this grant because they are not necessary, reasonable, or allocable for

the performance of this award. *See* 45 C.F.R. §§ 75.403-405.

### **COST SHARING OR MATCHING (NON-FEDERAL SHARE) OF PROGRAM FUNDING**

6. This program has a Maintenance of Effort (MOE) requirement per Section 513(a)(5) of the Act (42 U.S.C. § 713(a)(5)). No payment shall be made from the allotment awarded under 513(a)(4), if the non-federal expenditure is less than the amount expended by the state, organization, or entity for such programs or initiatives for fiscal year 2023 (or the fiscal year amended by subsequent Public Laws).
7. MOE is a statutory requirement where the state, local organization, or entities awarded under this program is required, as a condition of eligibility for federal funding, to maintain its financial contribution to the program. MOE must be used to supplement not supplant federal funds with existing non-federal funds. State, local organizations or entities under this award may not replace or supplant federal funds to meet program requirements.

### **FINANCIAL REPORTING**

8. Federal funds awarded under this grant must be expended for the purposes for which they were awarded and within the time period allotted.
9. The OMB approved Financial Reporting form for this program is the Federal Financial Report SF-425. The SF-425 is due annually and no later than December 30, which is 90 days after the end of each reporting period.
  - a. Submission Methodology: All periodic SF-425 financial reports for all grant programs must be submitted electronically through the Payment Management System (PMS). Recipients must not submit duplicate copies either by mail, by fax or as an email attachment of any reports submitted.
  - b. Submission Schedule: Annual. Each annual financial report must be submitted within 90 days (i.e., no later than December 30) following the end of each Federal Fiscal Year (FFY).
    - i. An interim financial report (covering Year 1 of the project period) is due 90 days following the end of Federal Fiscal Year 1.
    - ii. An interim financial report (covering Year 2 of the project period) is due 90 days following the end of the Federal Fiscal Year 2.
    - iii. A final financial report (cumulative, covering the entire 3-year project period) is due 120 days following the end of Federal Fiscal Year 3.
10. Obligation Deadline:
  - a. In accordance with [Section 503\(b\)](#) of the Act (42 U.S.C. § 703(b)), the State Personal Responsibility Education program has a 3-year project/obligation period starting from the first day of the FFY for which these funds were awarded through the last day of the next FFY. (i.e., October 1, Federal Fiscal Year 1 through September 30, Federal Fiscal Year 3.) Any Federal funds not obligated by the end of the obligation period will be recouped by this Department.
11. Liquidation Deadline:
  - a. In accordance with 2 CFR § 200.344(b), a recipient must liquidate all obligations incurred under the award no later than 120 days after the end of the funding/obligation period (i.e., December 30 following the end of Federal Fiscal Year 3). Any Federal funds from this award not liquidated by this date will be recouped by this Department.

### **PROGRAM REPORTING AND REQUIREMENTS**

12. The OMB approved Program Report form for this program is the Performance Progress Report (PPR). Semi-annual narrative program performance reports must describe the program activities carried out, including an assessment of the effectiveness of those activities in achieving the purposes of this award. Each report covers the preceding 6-month period and is due 30 days following the end of the 2nd and 4th quarters (i.e., no later than April 30 and October 30, respectively). Please refer to the general terms and conditions for electronic submission guidance.
13. All recipients and subrecipient(s), including their implementation sites, will be required to collect and report information on program implementation and program outcomes through a common set of performance measures. This requirement applies to any community partners who agree to host a site or recruit program participants (e.g., school districts, non-profits. Recipients must collect and report on these measures twice a year.
14. Recipients will be expected to check local and state laws, policies, and procedures to ensure that the collection of performance measures data is feasible and obtain any necessary permissions (e.g., formal agreements with partners, Institutional Review Board (IRB) approval, copies of school district approvals) to collect these data. Recipients are responsible for ensuring all subrecipients and implementation sites collect and submit the PREP performance measures. Recipients may develop additional indicators of program performance, as needed, including adding items to the entry or exit surveys. However, all FYSB OMB-approved items must be administered first, in the order presented in the approved survey, before any additional items are added. Any additional survey items should be added at the end of the OMB-approved survey and should not be submitted to ACF.
15. Additional program conditions:
  - a. Have the project fully functioning and serving youth within at least 90 days following the issuance of the Notice of Award.
  - b. Formally train facilitators/educators in the evidence-based effective program model or elements of the effective program model by professionals who can provide follow-up technical assistance to facilitators.
  - c. Provide PREP programming to youth populations that are the most high-risk or vulnerable for pregnancies and sexually transmitted infections, including HIV/AIDS, youth in or aging out of foster care or adjudication systems; youth who are victims of trafficking; youth who have runaway or left home without permission; youth experiencing homelessness; and other vulnerable or underserved youth populations.
  - d. Send at least two key staff persons to the Adolescent Pregnancy Prevention (APP) Program Grantee Training if held during the project period. A minimum of two staff persons are to attend at least one of two topical training sessions offered each year of the project in areas such as Washington, DC; Phoenix, AZ; and Boston, Massachusetts.
  - e. Collect and report on all OMB cleared federal PREP performance measures (recipient, partners and subrecipients). PREP Performance Measures are currently approved under OMB # 0970-0497, expiration date 07/31/2026.
  - f. For states and subrecipients conducting local evaluations, participate in training and TA provided by the federal government and follow related guidance provided by ACF/FYSB.
  - g. Submit curricula and programmatic materials to FYSB, as requested, for a medical accuracy review and provide a plan to comply with making any required modifications.

## PROPERTY REPORTING

16. The OMB approved property reporting forms are the following:
- h. Real Property Reports (SF-429s). The SF-429 Real Property forms are not applicable to this program. Purchase, construction, and major renovation are not an allowable activity or expenditure under this program.
  - i. Tangible Property Report (SF-428s). The SF-428 Tangible Personal Property forms must be submitted as described in the General Terms and Conditions.

#### POINTS OF CONTACT

17. Points of contact for additional information or questions concerning either the operation of the program or related financial matters can be found on the Notice of Award.
- a. Program Office:  
Sierra Baker  
Program Specialist  
330 C St., SW.  
Washington, DC 20201  
Sierra.Baker@acf.hhs.gov  
202-401-4663
  - b. Office Grants Management:  
David Lee  
Grants Management Officer  
330 C St., SW.  
Washington, DC. 20201  
David Lee@acf.hhs.gov  
202-401-5461

# Exhibit C

**From:** [Wolf, Lucy \(ATG\)](#)  
**To:** ["Lau, Jacqueline C \(CIV\)"; Luse, Susanne \(USAOR\)](#)  
**Cc:** [Chien, Marsha \(ATG\); Paradis, Kelly A. \(ATG\); Feldman, Sarah \(USAOR\); Ramsey, Keith \(USAOR\); Bennett, Michelle \(CIV\); McGinty, William \(ATG\); Powell, Molly \(ATG\); Diorio, Alexia \(ATG\)](#)  
**Subject:** RE: Washington State v. HHS  
**Date:** Sunday, January 11, 2026 11:10:44 AM  
**Attachments:** [FY25 FYSB State PREP Supplemental Terms and Conditions .pdf](#)

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Jacqueline,

We recently heard from our PREP state grantee that they received an email on Friday January 9, 2026, from Cheri Thompson at ACF seeking a Letter of Intent to request FY 2026 PREP funding. Unfortunately, that email attached Supplemental Terms and Conditions effective October 1, 2025 (attached hereto) that contained language identical to the enjoined Supplemental Terms and Conditions per the Court's October 27, 2025 Order enjoining HHS from "imposing or enforcing the Gender Conditions as defined in the... Supplemental T&Cs or any materially similar terms or conditions as to any PREP or SRAE funds awarded to Plaintiff States..." (Opinion and Order Page 76).

We are hoping that you can reach out to your client to ask them to withdraw and reissue the Supplemental Terms and Conditions without the Gender Conditions so that they can come into compliance with the Court's injunction.

ACF's email asked grant recipients to submit their Letter of Intent by this Tuesday January 13, 2026, and submit various application documents by January 23, 2026. It would be preferable if we could resolve this issue by the January 13 deadline or at the very latest, in advance of the January 23 deadline so as to clear up any confusion for state grantees.

Thank you for your quick attention to this issue. Please give me a call at (206) 837-2972 if you'd like to discuss further.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <Jacqueline.C.Lau@usdoj.gov>  
**Sent:** Monday, December 8, 2025 5:25 PM  
**To:** Wolf, Lucy (ATG) <Lucy.Wolf@atg.wa.gov>; Luse, Susanne (USAOR) <Susanne.Luse@usdoj.gov>  
**Cc:** Chien, Marsha (ATG) <marsha.chien@atg.wa.gov>; Paradis, Kelly A. (ATG) <kelly.paradis@atg.wa.gov>; Feldman, Sarah (USAOR) <Sarah.Feldman@usdoj.gov>; Ramsey, Keith (USAOR) <Keith.Ramsey@usdoj.gov>; Bennett, Michelle (CIV) <Michelle.Bennett@usdoj.gov>; McGinty, William (ATG) <william.mcginty@atg.wa.gov>; Powell, Molly (ATG) <Molly.Powell@atg.wa.gov>; Diorio, Alexia (ATG) <Alexia.Diorio@ATG.WA.GOV>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Received – thank you. I will get this on file.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 6:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Please find attached the proposed scheduling order with our signature block.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, December 8, 2025 1:05 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>

McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you for the update.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
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Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 3:20 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

We have circulated the proposed schedule to the multistate and will send our signature block this afternoon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
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(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, December 8, 2025 7:25 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you Lucy. That looks good. Please go ahead and add the signature blocks for Plaintiffs. Once those are added I will file.

Thanks,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 12:00 AM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline,

Please find attached a redlined version of the proposed scheduling order. We'd like to have the full three weeks to respond to the initial motion and we articulated our preferred oral argument schedule.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General

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(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Friday, December 5, 2025 1:54 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy,

Thank you for your email and the proposed schedule. While it is highly unusual for Defendants to move first in this posture, for the sake of agreeability we are willing to do so here. We do propose the following two changes: (1) filing the administrative record January 16, 2026 and (2) filing Defendants' dispositive motion on January 30, 2026. We will leave it up to you if you would like Plaintiffs to have their full three weeks (pushing the scheduling out one week) or if Plaintiffs are okay with two weeks to respond. If Plaintiffs are okay with the two weeks to respond, the schedule is as follows:

Friday, Jan 16, 2026: Defendants file Administrative Record  
Friday, Jan 30, 2026: Defendants file dispositive motion  
Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion  
Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion  
Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

I attached a draft stipulation reflecting this schedule. If this draft looks good to Plaintiffs, feel free to add Plaintiffs' signature blocks.

Regarding oral argument, Defendants defer to the Court's decision and the Court's schedule.

Please let me know your thoughts and I am happy to file on Monday.

Thank you and have a good weekend!

Best,

Jacqueline

**Jacqueline C. Lau**

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**From:** Lau, Jacqueline C (CIV)  
**Sent:** Friday, December 5, 2025 1:18 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Thank you Lucy. We are discussing internally and will get back with you shortly.

Best,

Jacqueline

**Jacqueline C. Lau**

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Thursday, December 4, 2025 3:44 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Thanks for the time to discuss internally. We're proposing a four brief schedule here, and we're suggesting that Defendants file the first brief. We think that's appropriate since

Defendants have yet to respond to the complaint, and Defendants' motion under this schedule will be its response for Rule 12 purposes.

With that understanding, here's a proposed schedule:

Friday, Jan 9, 2026: Defendants file Administrative Record

Friday, Jan 23, 2026: Defendants file dispositive motion

Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion

Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion

Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

We'd request oral argument on the cross-motions. Is there a date in late March or early April that would work for you?

Best,  
Lucy

**Lucy Wolf** (she/her)  
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Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Thursday, December 4, 2025 10:17 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thanks Lucy – we look forward to hearing from you.

Best,

**Jacqueline C. Lau**  
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U.S. Department of Justice, Civil Division  
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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, December 3, 2025 2:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline. We are discussing internally and will respond soon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
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Washington State Office of the Attorney General  
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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Tuesday, December 2, 2025 1:03 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and AG team,

I want to provide an update from DOJ's side in the State of Washington v. HHS case. There still has not been a decision made regarding appeal, but we agree it would be beneficial to move this case forward by negotiating a cross-dispositive motion briefing schedule. We plan to note we reserve our right to seek a stay if there is a decision to appeal. We spoke with HHS about their timeline to compile the administrative record. They believe they would be ready to produce the AR in the next few weeks. Then, depending on your schedule, we could craft the cross-dispositive motion schedule following an AR production date.

Please let me know your thoughts on negotiating a schedule and I am happy to

discuss further. Since our current responsive pleading deadline is December 9, we would like to file any joint schedule before then.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

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U.S. Department of Justice, Civil Division

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**From:** Lau, Jacqueline C (CIV)

**Sent:** Monday, November 17, 2025 1:52 PM

**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email and we appreciate Plaintiffs' position. Right now, Appellate is still considering whether to appeal the preliminary injunction order. We do not have a good sense of whether an appeal is likely or not because of the shutdown.

For now, we will represent that Plaintiffs oppose the motion but consent to a 14-day extension. Once we have a better sense of whether an appeal is likely or not, we will reach back out and then would be happy to negotiate a briefing schedule.

Thank you,

Jacqueline

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, November 17, 2025 12:21 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
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**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. We're not opposed in principle to an extension for you to respond to the complaint, but would rather that be part of a larger agreement to tee this up for cross-dispositive motions as quickly as possible.

If you're planning on appealing the PI within that window, and then moving to stay proceedings at the district court pending your appeal, then we're unlikely to agree as that could significantly delay an ultimate resolution of the case.

But if we could agree on dates by which we can expect the administrative record, and a briefing schedule following that, then that's something we'd be interested in.

Let us know if an extension to respond to the complaint within the context of a larger case schedule is something that we could agree on. If not, then you can represent that we oppose your motion, but would agree to a smaller extension of 14 days.

Thanks,  
Lucy

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(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, November 17, 2025 7:26 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and Washington AG team,

Following up on the email below. We are planning to file the motion for extension today. Thanks!

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)  
**Sent:** Thursday, November 13, 2025 1:38 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for Plaintiffs' response. Now that appropriations have been restored, we will not be filing a stay motion. We are now planning to file a Motion for Extension of Time, to request a 60-day extension of the responsive pleading deadline.

Please let me know Plaintiffs' position on the relief requested above. If Plaintiffs oppose such relief, please let me know if there is any relief short of the 60 days that Plaintiffs would consent to.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, November 12, 2025 1:44 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. Plaintiffs oppose your motion.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Wednesday, November 12, 2025 9:36 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hello All,

Thank you for the introduction, Susanne. It is nice to meet you, Lucy!

Defendants are preparing to file a Motion to Stay in this matter due to the lapse in appropriations and the upcoming notice of appeal deadline for the preliminary injunction order. Defendants are requesting a stay of district court proceedings in the case, including the November 25, 2025 responsive pleading deadline, until Congress restores appropriations or until the notice of appeal deadline has passed, whichever is later.

Defendants propose that the parties file a Joint Status Report 14 days after appropriations are restored or 14 days after the appeal deadline of December 26, 2025, whichever is later, to address next steps.

Please let me know if Plaintiffs consent to or oppose the relief requested in this motion and let me know if you have any questions.

Thank you!

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, November 12, 2025 11:38 AM  
**To:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Susanne,

Confirming I'll still be the lead attorney and copying others on our team.

Thanks,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Sent:** Wednesday, November 12, 2025 7:50 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Subject:** Washington State v. HHS

[EXTERNAL]

Lucy,

Copied here are Jacqueline Lau and Michelle Bennett. These wonderful attorneys will be taking over the defense of this case. However, Sarah and I will remain on the case in a support role.

Please confirm that you remain the plaintiffs "lead attorney" on this case. Thank you.

**SUSANNE LUSE**

**CHIEF | CIVIL DIVISION**

**UNITED STATES ATTORNEY'S OFFICE | DISTRICT OF OREGON**

1000 SW Third Avenue, Suite 600 | Portland, Oregon 97204

Office: 503-727-1019 | Cell: 503-351-8704 | Fax: 503-727-1117

# Exhibit D

**From:** [Lau, Jacqueline C \(CIV\)](#)  
**To:** [Wolf, Lucy \(ATG\)](#); [Luse, Susanne \(USAOR\)](#)  
**Cc:** [Chien, Marsha \(ATG\)](#); [Paradis, Kelly A. \(ATG\)](#); [Feldman, Sarah \(USAOR\)](#); [Ramsey, Keith \(USAOR\)](#); [Bennett, Michelle \(CIV\)](#); [McGinty, William \(ATG\)](#); [Powell, Molly \(ATG\)](#); [Diorio, Alexia \(ATG\)](#)  
**Subject:** RE: Washington State v. HHS  
**Date:** Monday, January 12, 2026 1:39:04 PM

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[EXTERNAL]

Hi Lucy,

Our client confirmed that the Supplemental Term and Condition at Paragraph 5 regarding gender ideology was an oversight. It is general practice at HHS to include a version of the Supplemental Terms and Conditions to give applicants a sense of what to expect if their application is approved, and this version was from 2025. The 2026 Supplemental Terms and Conditions are still being drafted. If the preliminary injunction is still in effect when Notices of Award are issued, the 2026 Supplemental Terms and Conditions for any plaintiff state will not include Paragraph 5. ACF plans to send an email to state grantees explaining the above, reminding them of the PI, clarifying that states are not bound by the gender ideology clause while the PI is in place, and confirming that inclusion of paragraph 5 was an oversight.

Thank you for bringing this to our attention and please let me know if you have any questions.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)  
**Sent:** Monday, January 12, 2026 10:24 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginity@atg.wa.gov](mailto:william.mcginity@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email. We will discuss with our client and get back with you.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Sunday, January 11, 2026 2:11 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

We recently heard from our PREP state grantee that they received an email on Friday January 9, 2026, from Cheri Thompson at ACF seeking a Letter of Intent to request FY 2026 PREP funding. Unfortunately, that email attached Supplemental Terms and Conditions effective October 1, 2025 (attached hereto) that contained language identical to the enjoined Supplemental Terms and Conditions per the Court's October 27, 2025 Order enjoining HHS from "imposing or enforcing the Gender Conditions as defined in the... Supplemental T&Cs or any materially similar terms or conditions as to any PREP or SRAE funds awarded to Plaintiff States..." (Opinion and Order Page 76).

We are hoping that you can reach out to your client to ask them to withdraw and reissue the Supplemental Terms and Conditions without the Gender Conditions so that they can come into compliance with the Court's injunction.

ACF's email asked grant recipients to submit their Letter of Intent by this Tuesday January 13, 2026, and submit various application documents by January 23, 2026. It would be preferable if we could resolve this issue by the January 13 deadline or at the very latest, in advance of the January 23 deadline so as to clear up any confusion for state grantees.

Thank you for your quick attention to this issue. Please give me a call at (206) 837-2972 if you'd like to discuss further.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, December 8, 2025 5:25 PM  
**To:** Wolf, Lucy (ATG) <[Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[Molly.Powell@atg.wa.gov](mailto:Molly.Powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Received – thank you. I will get this on file.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 6:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Please find attached the proposed scheduling order with our signature block.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**Sent:** Monday, December 8, 2025 1:05 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you for the update.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 3:20 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG)

<[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

We have circulated the proposed schedule to the multistate and will send our signature block this afternoon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Monday, December 8, 2025 7:25 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you Lucy. That looks good. Please go ahead and add the signature blocks for Plaintiffs. Once those are added I will file.

Thanks,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, December 8, 2025 12:00 AM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR)

<[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline,

Please find attached a redlined version of the proposed scheduling order. We'd like to have the full three weeks to respond to the initial motion and we articulated our preferred oral argument schedule.

Best,  
Lucy

**Lucy Wolf** (she/her)  
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(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Friday, December 5, 2025 1:54 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy,

Thank you for your email and the proposed schedule. While it is highly unusual for Defendants to move first in this posture, for the sake of agreeability we are willing to do so here. We do propose the following two changes: (1) filing the administrative record January 16, 2026 and (2) filing Defendants' dispositive motion on January 30, 2026. We will leave it up to you if you would like Plaintiffs to have their full three weeks (pushing the scheduling out one week) or if Plaintiffs are okay with two weeks to respond. If Plaintiffs are okay with the two weeks to respond, the schedule is as follows:

Friday, Jan 16, 2026: Defendants file Administrative Record  
Friday, Jan 30, 2026: Defendants file dispositive motion  
Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion  
Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion  
Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

I attached a draft stipulation reflecting this schedule. If this draft looks good to Plaintiffs, feel free to add Plaintiffs' signature blocks.

Regarding oral argument, Defendants defer to the Court's decision and the Court's schedule.

Please let me know your thoughts and I am happy to file on Monday.

Thank you and have a good weekend!

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)  
**Sent:** Friday, December 5, 2025 1:18 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Thank you Lucy. We are discussing internally and will get back with you shortly.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch

U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Thursday, December 4, 2025 3:44 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Thanks for the time to discuss internally. We're proposing a four brief schedule here, and we're suggesting that Defendants file the first brief. We think that's appropriate since Defendants have yet to respond to the complaint, and Defendants' motion under this schedule will be its response for Rule 12 purposes.

With that understanding, here's a proposed schedule:

Friday, Jan 9, 2026: Defendants file Administrative Record  
Friday, Jan 23, 2026: Defendants file dispositive motion  
Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion  
Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion  
Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

We'd request oral argument on the cross-motions. Is there a date in late March or early April that would work for you?

Best,  
Lucy

**Lucy Wolf** (she/her)  
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Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Thursday, December 4, 2025 10:17 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG)

<[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thanks Lucy – we look forward to hearing from you.

Best,

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, December 3, 2025 2:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline. We are discussing internally and will respond soon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
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Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Tuesday, December 2, 2025 1:03 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith

(USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and AG team,

I want to provide an update from DOJ's side in the State of Washington v. HHS case. There still has not been a decision made regarding appeal, but we agree it would be beneficial to move this case forward by negotiating a cross-dispositive motion briefing schedule. We plan to note we reserve our right to seek a stay if there is a decision to appeal. We spoke with HHS about their timeline to compile the administrative record. They believe they would be ready to produce the AR in the next few weeks. Then, depending on your schedule, we could craft the cross-dispositive motion schedule following an AR production date.

Please let me know your thoughts on negotiating a schedule and I am happy to discuss further. Since our current responsive pleading deadline is December 9, we would like to file any joint schedule before then.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Lau, Jacqueline C (CIV)

**Sent:** Monday, November 17, 2025 1:52 PM

**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG)

<[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith

(USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>;

McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG)

<[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email and we appreciate Plaintiffs' position. Right now, Appellate is still considering whether to appeal the preliminary injunction order. We do not have

a good sense of whether an appeal is likely or not because of the shutdown.

For now, we will represent that Plaintiffs oppose the motion but consent to a 14-day extension. Once we have a better sense of whether an appeal is likely or not, we will reach back out and then would be happy to negotiate a briefing schedule.

Thank you,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, November 17, 2025 12:21 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. We're not opposed in principle to an extension for you to respond to the complaint, but would rather that be part of a larger agreement to tee this up for cross-dispositive motions as quickly as possible.

If you're planning on appealing the PI within that window, and then moving to stay proceedings at the district court pending your appeal, then we're unlikely to agree as that could significantly delay an ultimate resolution of the case.

But if we could agree on dates by which we can expect the administrative record, and a briefing schedule following that, then that's something we'd be interested in.

Let us know if an extension to respond to the complaint within the context of a larger case schedule is something that we could agree on. If not, then you can represent that we oppose your motion, but would agree to a smaller extension of 14 days.

Thanks,  
Lucy

**Lucy Wolf** (she/her)  
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Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, November 17, 2025 7:26 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and Washington AG team,

Following up on the email below. We are planning to file the motion for extension today. Thanks!

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Lau, Jacqueline C (CIV)  
**Sent:** Thursday, November 13, 2025 1:38 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for Plaintiffs' response. Now that appropriations have been restored, we will not be filing a stay motion. We are now planning to file a Motion for Extension of Time, to request a 60-day extension of the responsive pleading deadline.

Please let me know Plaintiffs' position on the relief requested above. If Plaintiffs oppose such relief, please let me know if there is any relief short of the 60 days that Plaintiffs would consent to.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Wednesday, November 12, 2025 1:44 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. Plaintiffs oppose your motion.

Best,  
Lucy

**Lucy Wolf** (she/her)

Assistant Attorney General

Complex Litigation Division

Washington State Office of the Attorney General

(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Wednesday, November 12, 2025 9:36 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hello All,

Thank you for the introduction, Susanne. It is nice to meet you, Lucy!

Defendants are preparing to file a Motion to Stay in this matter due to the lapse in appropriations and the upcoming notice of appeal deadline for the preliminary injunction order. Defendants are requesting a stay of district court proceedings in the case, including the November 25, 2025 responsive pleading deadline, until Congress restores appropriations or until the notice of appeal deadline has passed, whichever is later.

Defendants propose that the parties file a Joint Status Report 14 days after appropriations are restored or 14 days after the appeal deadline of December 26, 2025, whichever is later, to address next steps.

Please let me know if Plaintiffs consent to or oppose the relief requested in this motion and let me know if you have any questions.

Thank you!

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, November 12, 2025 11:38 AM  
**To:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; McGinty, William (ATG)

<[william.mcgintry@atg.wa.gov](mailto:william.mcgintry@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Susanne,

Confirming I'll still be the lead attorney and copying others on our team.

Thanks,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Sent:** Wednesday, November 12, 2025 7:50 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Subject:** Washington State v. HHS

[EXTERNAL]

Lucy,

Copied here are Jacqueline Lau and Michelle Bennett. These wonderful attorneys will be taking over the defense of this case. However, Sarah and I will remain on the case in a support role.

Please confirm that you remain the plaintiffs "lead attorney" on this case. Thank you.

**SUSANNE LUSE**

**CHIEF | CIVIL DIVISION**

**UNITED STATES ATTORNEY'S OFFICE | DISTRICT OF OREGON**

1000 SW Third Avenue, Suite 600 | Portland, Oregon 97204

Office: 503-727-1019 | Cell: 503-351-8704 | Fax: 503-727-1117

# Exhibit E



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2601WAPREP  
FAIN# 2601WAPREP  
Federal Award Date: January 30, 2026

**Recipient Information**

- 1. Recipient Name**  
HEALTH, WASHINGTON STATE  
DEPARTMENT OF  
PO Box 47880  
  
OLYMPIA, WASHINGTON 98504 7880
- 2. Congressional District of Recipient**  
\*See Remarks
- 3. Payment Account Number and Type**  
\*See Remarks
- 4. Employer Identification Number (EIN)**  
1911444603A1
- 5. Data Universal Numbering System (DUNS)**  
808883128
- 6. Recipient's Unique Entity Identifier**  
C16SP2HBR123
- 7. Project Director or Principal Investigator**  
Mary Clark  
  
Mary.Clark@doh.Wa.Gov  
360-236-3940
- 8. Authorized Official**  
\*See Remarks

**Federal Agency Information**

- 9. Awarding Agency Contact Information**  
David Lee  
Grants Management Officer  
david.lee@acf.hhs.gov  
202-401-5461
- 10. Program Official Contact Information**  
Debbie Powell  
Deputy Associate Commissioner  
ACYF - Family and Youth Services Bureau  
debbie.powell@acf.hhs.gov  
(202) 205 2360

**Federal Award Information**

- 11. Award Number**  
2601WAPREP
- 12. Unique Federal Award Identification Number (FAIN)**  
2601WAPREP
- 13. Statutory Authority**  
Section 513 of the Social Security Act
- 14. Federal Award Project Title**  
\*See Remarks
- 15. Assistance Listing Number**  
93.092
- 16. Assistance Listing Program Title**  
Personal Responsibility Education Program
- 17. Award Action Type**  
New
- 18. Is the Award R&D?**  
\*See Remarks

| Summary Federal Award   | Financial Information      |
|---|----------------------------|
| <b>19. Budget Period Start Date</b> 10-01-2025                                    | <b>End Date</b> 09-30-2028 |
| <b>20. Total Amount of Federal Funds Obligated by this Action</b>                 | \$378,726.00               |
| 20a. Direct Cost Amount   | *See Remarks               |
| 20b. Indirect Cost Amount Administrative Offset                                   | *See Remarks               |
| 21. Authorized Carryover  | *See Remarks               |
| 22. Offset  | *See Remarks               |
| 23. Total Amount of Federal Funds Obligated this budget period                    | \$378,726.00               |
| <b>24. Total Approved Cost Sharing or Matching, where applicable</b>              | *See Remarks               |
| <b>25. Total Federal and Non-Federal Approved</b>                                 | *See Remarks               |
| <b>26. Project Period Start Date</b> 10-01-2025 -                                 | <b>End Date</b> 09-30-2028 |
| 27. Total Amount of the Federal Award including Approved Cost Sharing or Matching | *See Remarks               |

- 28. Authorized Treatment of Program Income**  
\*See Remarks
- 29. Grants Management Officer – Signature**

David Lee  
Grants Management Officer

**Footnotes**

This award represents CR1 funding for the total approved FY 2026 State PREP Program budget. The remaining balance will be awarded at a later date, subject to the availability of funds.



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2601WAPREP  
FAIN# 2601WAPREP  
Federal Award Date: January 30, 2026

**Recipient Information**

HEALTH, WASHINGTON STATE DEPARTMENT OF  
PO Box 47880  
OLYMPIA, WASHINGTON 98504 7880

**Employer Identification Number (EIN):** 1911444603A1

**Data Universal Numbering System (DUNS):** 808883128

**Recipient's Unique Entity Identifier:** C16SP2HBR123

**Object Class:** 41.15

**Financial Information**

| <u>Appropriation</u> | <u>CAN</u>   | <u>Allotment</u> | <u>Award this action</u> | <u>Cumulative Grant</u> |  | <u>Document Number</u> | <u>Funding Type</u> |
|----------------------|--------------|------------------|--------------------------|-------------------------|--|------------------------|---------------------|
|                      |              |                  |                          | <u>Award to Date</u>    |  |                        |                     |
| 75-X-1512            | 2026,G99SU26 | \$1,133,232.00   | \$378,726.00             | \$378,726.00            |  | 2601WAPREP             | Formula             |

**Terms and Conditions**

This grant award represents an obligation for the ACF Family and Youth Services Bureau State Personal Responsibility Education Program. Funds are subject to the requirements of Section 513 of Social Security Act.

This award is subject to the requirements listed in the terms and conditions. The use of Federal funds from this award constitutes the grantee's acceptance of the listed terms and conditions. The electronic copy of Terms and Conditions to support this program can be found on the website at:

<https://acf.gov/grants/manage-grant/grant-award/award-terms>.

Recipients are prohibited from including gender ideology in any program or service that is funded with this award. The statutory authority for the PREP program under which this grant has been awarded, at 42 U.S.C. § 713, does not authorize teaching students that gender identity is distinct from biological sex or boys can identify as girls and vice versa, or that there is a vast spectrum of genders that are disconnected from one's sex. Therefore, gender ideology is outside of the scope of the statutory authority for this award. In addition, any costs associated with gender ideology are not allowable expenditures of federal grant funds or maintenance-of -effort funds for this grant because they are not necessary, reasonable, or allocable for the performance of this award. See 45 C.F.R. §§ 75.403-405.

**Remarks**

\* This field is intended to be included in the standardized Notice of Award and will be displayed in subsequent quarters.

This award represents CR1 funding for the total approved FY 2026 State PREP Program budget. The remaining balance will be awarded at a later date, subject to the availability of funds.

# Exhibit F



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2602WISRAE  
FAIN# 2602WISRAE  
Federal Award Date: January 29, 2026

**Recipient Information**

**1. Recipient Name**  
STATE OF WISCONSIN DEPARTMENT OF  
HEALTH SERVICES  
1 W. WILSON ST RM 250

MADISON, WISCONSIN 53703 3445

**2. Congressional District of Recipient**  
\*See Remarks

**3. Payment Account Number and Type**  
\*See Remarks

**4. Employer Identification Number (EIN)**  
1396006469C4

**5. Data Universal Numbering System (DUNS)**  
036448835

**6. Recipient's Unique Entity Identifier**  
CG2SZ7HCNV54

**7. Project Director or Principal Investigator**  
Tessa Donaldson  
Adolescent Health Coordinator  
Tessar.donaldson@dhs.wisconsin.gov

**8. Authorized Official**  
\*See Remarks

**Federal Agency Information**

**9. Awarding Agency Contact Information**  
David Lee  
Grants Management Officer  
david.lee@acf.hhs.gov  
202-401-5461

**10. Program Official Contact Information**  
Jerry Milner  
Program Authorizing Official  
ACYF - Family and Youth Services Bureau  
Milner.Jerry@acf.hhs.gov  
111-111-1111

**Federal Award Information**

**11. Award Number**  
2602WISRAE  
**12. Unique Federal Award Identification Number (FAIN)**  
2602WISRAE  
**13. Statutory Authority**  
The Bipartisan Budget Act of 2018, Title V, Section 2954, Public Law 113-93, 42 US Code 710  
**14. Federal Award Project Title**  
\*See Remarks  
**15. Assistance Listing Number**  
93.235  
**16. Assistance Listing Program Title**  
Sexual Risk Avoidance Education (SRAE)  
**17. Award Action Type**  
New  
**18. Is the Award R&D?**  
\*See Remarks

| Summary Federal Award   | Financial Information      |
|---|----------------------------|
| <b>19. Budget Period Start Date</b> 10-01-2025                                    | <b>End Date</b> 09-30-2027 |
| <b>20. Total Amount of Federal Funds Obligated by this Action</b>                 | \$267,966.00               |
| 20a. Direct Cost Amount   | *See Remarks               |
| 20b. Indirect Cost Amount Administrative Offset                                   | *See Remarks               |
| 21. Authorized Carryover  | *See Remarks               |
| 22. Offset  | *See Remarks               |
| 23. Total Amount of Federal Funds Obligated this budget period                    | \$267,966.00               |
| <b>24. Total Approved Cost Sharing or Matching, where applicable</b>              | *See Remarks               |
| <b>25. Total Federal and Non-Federal Approved</b>                                 | *See Remarks               |
| <b>26. Project Period Start Date</b> 10-01-2025 -                                 | <b>End Date</b> 09-30-2027 |
| 27. Total Amount of the Federal Award including Approved Cost Sharing or Matching | *See Remarks               |

**28. Authorized Treatment of Program Income**  
\*See Remarks  
**29. Grants Management Officer – Signature**

David Lee  
Grants Management Officer

**Footnotes**



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2602WISRAE  
FAIN# 2602WISRAE  
Federal Award Date: January 29, 2026

**Recipient Information**

STATE OF WISCONSIN DEPARTMENT OF HEALTH SERVICES  
1 W. WILSON ST RM 250  
MADISON, WISCONSIN 53703 3445  
**Employer Identification Number (EIN):** 1396006469C4  
**Data Universal Numbering System (DUNS):** 036448835  
**Recipient's Unique Entity Identifier:** CG2SZ7HCNV54  
**Object Class:** 41.15

**Financial Information**

| <u>Appropriation</u> | <u>CAN</u>   | <u>Allotment</u> | <u>Award this action</u> | <u>Cumulative Grant</u> |  | <u>Document Number</u> | <u>Funding Type</u> |
|----------------------|--------------|------------------|--------------------------|-------------------------|--|------------------------|---------------------|
|                      |              |                  |                          | <u>Award to Date</u>    |  |                        |                     |
| 75-26-1512           | 2026,G990597 | \$801,812.00     | \$267,966.00             | \$267,966.00            |  | 2602WISRAE             | Formula             |

**Terms and Conditions**

This grant award represents an obligation for the ACF Family and Youth Services Bureau State Sexual Risk Avoidance Education Program. Funds are subject to the requirements of Section 510 of Social Security Act.  
This award is subject to the requirements listed in the terms and conditions. The use of Federal funds from this award constitutes the grantee's acceptance of the listed terms and conditions. The electronic copy of Terms and Conditions to support this program can be found on the website at: <https://acf.gov/grants/manage-grant/grant-award/award-terms>.  
Recipients are prohibited from including gender ideology in any program or service that is funded with this award. The statutory authority for the SRAE program under which this grant has been awarded, at 42 U.S.C. § 710, does not authorize teaching students that gender identity is distinct from biological sex or boys can identify as girls and vice versa, or that there is a vast spectrum of genders that are disconnected from one's sex. Therefore, gender ideology is outside of the scope of the statutory authority for this award. In addition, any costs associated with gender ideology are not allowable expenditures for this grant because they are not necessary, reasonable, or allocable for the performance of this award. See 45 C.F.R. §§ 75.403-405.

**Remarks**

\* This field is intended to be included in the standardized Notice of Award and will be displayed in subsequent quarters.  
This award represents CR1 funding for the total approved FY 2026 State Program budget. The remaining balance will be awarded at a later date, subject to the availability of funds.

# Exhibit G



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

**FISCAL YEAR 2025**

**SUPPLEMENTAL TERMS and CONDITIONS**

The *ACF Standard Terms and Conditions* applies to all ACF awards and is located on the [Award Terms and Conditions](#) (T&C) page. The *Supplemental Terms and Conditions* herein are additional requirements applicable to the program named below.

By acceptance of awards for this program, the recipient agrees to comply with the requirements included in both the *Standard* and *Supplemental Terms and Conditions* for this program.

**Administration on Children, Youth, and Families (ACYF)  
Family and Youth Services Bureau (FYSB)**

**Title V State Sexual Risk Avoidance Education (SRAE) Program**

Assistance Listing No. 93.235

**EFFECTIVE PERIOD**

The supplemental T&Cs are effective on the date shown in the footer at the bottom of the respective pages and applies to awards and award modifications that add funding which are issued on or after that date (including any supplements to awards and competing and non-competing continuation awards). For recipients of such awards, the T&Cs supersede all previous similar T&Cs and will remain in effect until updated for subsequent awards. All T&Cs will be updated and reissued, as needed.

**APPLICABLE LEGISLATION, STATUTE, REGULATIONS**

1. The administration of this program is authorized under Title V, [Section 510](#), of the Social Security Act (the Act).
2. The program is codified at [42 U.S.C. §710](#).
3. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards located under 2 CFR Parts [200](#) and [300](#). In accordance with 2 CFR §200.101, Applicability, this program must comply with 2 CFR 200 in its entirety. No exceptions were identified.
4. Additional program and applicable regulation and requirements include:
  - a. The Notice of Funding Opportunity (NOFO) found here: [HHS-2024-ACF-ACYF-SRAE-0044](#)
  - b. [The ACF Standard Terms and Conditions](#)

**ADDITIONAL TERM AND CONDITION**

5. Recipients are prohibited from including gender ideology in any program or service that is funded with this award. The statutory authority for the SRAE program under which this grant has been awarded, at 42 U.S.C. §710, does not authorize teaching students that gender identity is distinct from biological sex or boys can identify as girls and vice versa, or that there is a vast spectrum of genders that are disconnected from one's sex. Therefore, gender ideology is outside of the scope of the statutory authority for this award. In addition, any costs associated with gender ideology are not allowable expenditures of federal grant funds or maintenance-of-effort funds for this grant because they are not necessary, reasonable, or allocable for the performance of this award. *See* 45 C.F.R. §§ 75.403-405.

**COST SHARING OR MATCHING (NON-FEDERAL SHARE) OF PROGRAM FUNDING**

6. The Title V State SRAE does not require a match.

**FINANCIAL MANAGEMENT AND REPORTING**

7. Federal funds awarded under this grant must be expended for the purposes for which they were awarded and within the time period allotted.
8. The OMB approved Financial Reporting form for this program is the Federal Financial Report SF-425. The SF-425 is due annually and no later than December 30, which is 90 days after the end of each reporting period.
  - a. Submission Methodology: All periodic SF-425 financial reports for all grant programs must be submitted electronically through the Payment Management System (PMS). Recipients must not submit duplicate copies either by mail, by fax or as an email attachment of any reports submitted.
  - b. Submission Schedule: Annual. Each annual financial report must be submitted within 90 days (i.e., no later than December 30) following the end of each Federal Fiscal Year (FFY).
    - i. An interim financial report (covering Year 1 of the project period) is due 90 days following the end of Federal Fiscal Year 1.
    - ii. A final financial report (cumulative, covering the entire 2-year project period) is due 120 days following the end of Federal Fiscal Year 2.
9. Obligation Deadline:
  - a. In accordance with [Section 503\(b\)](#) of the Act (42 U.S.C. §703(b)), the Title V State Sexual Risk Avoidance Education program has a 2-year project/obligation period starting from the first day of the FFY for which these funds were awarded through the last day of the next FFY. (i.e., October 1, Federal Fiscal Year 1 through September 30, Federal Fiscal Year 2). Any Federal funds not obligated by the end of the obligation period will be recouped by this Department.
10. Liquidation Deadline:
  - a. In accordance with 2 CFR §200.344(b), a recipient must liquidate all obligations incurred under the award no later than 120 days after the end of the funding/obligation period (i.e., January 30 following the end of Federal Fiscal Year 2). Any Federal funds from this award not liquidated by this date will be recouped by this Department.

**PROGRAM MANAGEMENT AND REPORTING**

11. The OMB approved Program Report form for this program is the Performance Progress Report (PPR). Semi-annual narrative program performance reports must describe the program activities carried out,

including an assessment of the effectiveness of those activities in achieving the purposes of this award. Each report covers the preceding 6-month period and is due 30 days following the end of the 2nd and 4th quarters (i.e., no later than April 30 and October 30, respectively). Please refer to the general terms and conditions for Electronic Submission guidance.

12. All recipients and subrecipient(s), including their implementation sites, will be required to collect and report information on program implementation and program outcomes through a common set of performance measures. This requirement applies to any community partners that agree to host a site or recruit program participants (e.g., school districts, non-profits). SRAE performance measures will be distributed to funded recipients, that will be required to collect and report on these measures approximately twice a year. ACF has defined measures at the recipient, provider, and program levels.
13. Recipients will be expected to check local and state laws, policies, and procedures to ensure that the collection of performance measures data is feasible and obtain any necessary permissions (e.g., formal agreements with partners, Institutional Review Board (IRB) approval, copies of school district approvals) to collect these data. Recipients are responsible for ensuring all subrecipients and implementation sites collect and submit the SRAE performance measures. Recipients may develop additional indicators of program performance, as needed, including adding items to the entry or exit surveys. However, all FYSB OMB-approved items must be administered first, in the order presented in the approved survey, before any additional items are added. Any additional survey items should be added at the end of the OMB-approved survey and should not be submitted to ACF.
14. Additional program conditions:
  - a. Have the project fully functioning and serving youth within at least 90 days following the issuance of the Notice of Award.
  - b. Formally train facilitators/educators in the evidence-based effective program model or elements of the effective program model by professionals who can provide follow-up technical assistance to facilitators.
  - c. Provide SRAE programming that demonstrates the incorporation of positive youth development (PYD) and meaningful youth engagement.
  - d. Send at least two key staff persons to the Adolescent Pregnancy Prevention (APP) Program Grantee Training, if held during the project period. A minimum of two staff persons are to attend at least one of two topical training sessions offered each year of the project in areas such as Washington, DC; Phoenix, AZ; and Boston, MA.
  - e. Collect and report on all OMB cleared federal SRAE performance measures (recipient, partners, and subrecipients). SRAE Performance Measures are currently approved under OMB # 0970-0536, expiration date 12/31/2025.
  - f. For states and subrecipients conducting local evaluations, participate in training and TA provided by the federal government and follow related guidance provided by ACF/FYSB.
  - g. Submit curricula and programmatic materials to FYSB, as requested, for a medical accuracy review and provide a plan to comply with making any required modifications.
  - h. Agree to participate in the National Evaluation, if selected.

## PROPERTY REPORTING

15. The OMB approved property reporting is the following:
- a. Real Property Reports (SF-429s). The SF-429 Real Property forms are not applicable to this program. Purchase, construction, and major renovation are not an allowable activity or expenditure under this award. For more information, see the *ACF Standard Terms and Conditions*.
  - b. Tangible Property Report (SF-428s). The SF-428 Tangible Personal Property forms must be submitted as described in the *ACF Standard Terms and Conditions*.

## POINTS OF CONTACT

16. Points of contact for additional information or questions concerning either the operation of the program or related financial matters can be found on the *Notice of Award*.
- a. Program Office  
MeGan Hill  
Program Specialist  
330 C Street, S.W.  
Washington, D.C. 20201  
E-mail: [megan.hill@acf.hhs.gov](mailto:megan.hill@acf.hhs.gov)  
Phone: (301) 348-3565
  - b. Office of Grants Management  
David Lee  
Supervisory Grant Management Specialist  
330 C Street, S.W.  
Washington, D.C. 20201  
E-mail: [david.lee@acf.hhs.gov](mailto:david.lee@acf.hhs.gov)  
Phone: (202) 401-5461

# Exhibit H

**From:** [Wolf, Lucy \(ATG\)](#)  
**To:** ["Lau, Jacqueline C \(CIV\)"; "Luse, Susanne \(USAOR\)"](#)  
**Cc:** [Chien, Marsha \(ATG\); Paradis, Kelly A. \(ATG\); "Feldman, Sarah \(USAOR\)"; "Ramsey, Keith \(USAOR\)"; "Bennett, Michelle \(CIV\)"; McGinty, William \(ATG\); Powell, Molly \(ATG\); Diorio, Alexia \(ATG\)](#)  
**Subject:** RE: Washington State v. HHS  
**Date:** Friday, February 6, 2026 9:08:08 AM  
**Attachments:** [Wisconsin PREP NOA.pdf](#)  
[WISCONSIN SRAE CR1NOA.pdf](#)  
[FY25 FYSB State PREP Supp T-C.pdf](#)  
[FY25 FYSB State SRAE Supp T-C.pdf](#)

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Hi Jacqueline,

We recently learned that State Grantees received 2026 PREP and SRAE NOAs on January 30, 2026, that included the enjoined "gender ideology" language ("Recipients are prohibited from including gender ideology in any program or service that is funded with this award..."). The 2026 PREP and SRAE NOAs also link to the 2025 Terms and Conditions, which include enjoined language. I've attached example NOAs and the linked Terms and Conditions.

As currently drafted, the NOAs and Terms and Conditions violate the court's injunction in this case. Our understanding from your email below is that, since the injunction is still in place, the NOAs and Terms and Conditions would not include the enjoined "gender ideology" language. Please reach out to your client to ask them to withdraw and reissue the NOAs without the enjoined language and with links to the updated 2026 Terms and Conditions that do not include paragraph 5.

Please give me a call at (206) 837-2972 if you'd like to discuss further.

Best,  
Lucy

---

**From:** Wolf, Lucy (ATG)  
**Sent:** Monday, January 12, 2026 1:42 PM  
**To:** 'Lau, Jacqueline C (CIV)' <Jacqueline.C.Lau@usdoj.gov>; Luse, Susanne (USAOR) <Susanne.Luse@usdoj.gov>  
**Cc:** Chien, Marsha (ATG) <marsha.chien@atg.wa.gov>; Paradis, Kelly A. (ATG) <kelly.paradis@atg.wa.gov>; Feldman, Sarah (USAOR) <Sarah.Feldman@usdoj.gov>; Ramsey, Keith (USAOR) <Keith.Ramsey@usdoj.gov>; Bennett, Michelle (CIV) <Michelle.Bennett@usdoj.gov>; McGinty, William (ATG) <william.mcginity@atg.wa.gov>; Powell, Molly (ATG) <Molly.Powell@atg.wa.gov>; Diorio, Alexia (ATG) <Alexia.Diorio@ATG.WA.GOV>  
**Subject:** RE: Washington State v. HHS

Thanks Jacqueline. I really appreciate you tracking down this information. Our State Grantees will look forward to that clarifying email from ACF.

Best,  
Lucy

---

**From:** Lau, Jacqueline C (CIV) <Jacqueline.C.Lau@usdoj.gov>  
**Sent:** Monday, January 12, 2026 1:39 PM  
**To:** Wolf, Lucy (ATG) <lucy.wolf@atg.wa.gov>; Luse, Susanne (USAOR) <Susanne.Luse@usdoj.gov>  
**Cc:** Chien, Marsha (ATG) <marsha.chien@atg.wa.gov>; Paradis, Kelly A. (ATG) <kelly.paradis@atg.wa.gov>; Feldman, Sarah (USAOR) <Sarah.Feldman@usdoj.gov>; Ramsey, Keith (USAOR) <Keith.Ramsey@usdoj.gov>; Bennett, Michelle (CIV) <Michelle.Bennett@usdoj.gov>; McGinty, William (ATG) <william.mcginty@atg.wa.gov>; Powell, Molly (ATG) <molly.powell@atg.wa.gov>; Diorio, Alexia (ATG) <Alexia.Diorio@ATG.WA.GOV>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy,

Our client confirmed that the Supplemental Term and Condition at Paragraph 5 regarding gender ideology was an oversight. It is general practice at HHS to include a version of the Supplemental Terms and Conditions to give applicants a sense of what to expect if their application is approved, and this version was from 2025. The 2026 Supplemental Terms and Conditions are still being drafted. If the preliminary injunction is still in effect when Notices of Award are issued, the 2026 Supplemental Terms and Conditions for any plaintiff state will not include Paragraph 5. ACF plans to send an email to state grantees explaining the above, reminding them of the PI, clarifying that states are not bound by the gender ideology clause while the PI is in place, and confirming that inclusion of paragraph 5 was an oversight.

Thank you for bringing this to our attention and please let me know if you have any questions.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)  
**Sent:** Monday, January 12, 2026 10:24 AM  
**To:** Wolf, Lucy (ATG) <lucy.wolf@atg.wa.gov>; Luse, Susanne (USAOR) <Susanne.Luse@usdoj.gov>  
**Cc:** Chien, Marsha (ATG) <marsha.chien@atg.wa.gov>; Paradis, Kelly A. (ATG) <kelly.paradis@atg.wa.gov>; Feldman, Sarah (USAOR) <Sarah.Feldman@usdoj.gov>; Ramsey, Keith (USAOR) <Keith.Ramsey@usdoj.gov>; Bennett, Michelle (CIV) <Michelle.Bennett@usdoj.gov>; McGinty, William (ATG) <william.mcginty@atg.wa.gov>; Powell, Molly (ATG) <molly.powell@atg.wa.gov>; Diorio, Alexia (ATG) <Alexia.Diorio@ATG.WA.GOV>

**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email. We will discuss with our client and get back with you.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Sunday, January 11, 2026 2:11 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

We recently heard from our PREP state grantee that they received an email on Friday January 9, 2026, from Cheri Thompson at ACF seeking a Letter of Intent to request FY 2026 PREP funding. Unfortunately, that email attached Supplemental Terms and Conditions effective October 1, 2025 (attached hereto) that contained language identical to the enjoined Supplemental Terms and Conditions per the Court's October 27, 2025 Order enjoining HHS from "imposing or enforcing the Gender Conditions as defined in the... Supplemental T&Cs or any materially similar terms or conditions as to any PREP or SRAE funds awarded to Plaintiff States..." (Opinion and Order Page 76).

We are hoping that you can reach out to your client to ask them to withdraw and reissue the Supplemental Terms and Conditions without the Gender Conditions so that they can come into compliance with the Court's injunction.

ACF's email asked grant recipients to submit their Letter of Intent by this Tuesday January 13, 2026, and submit various application documents by January 23, 2026. It would be preferable if we could resolve this issue by the January 13 deadline or at the very latest, in advance of the January 23 deadline so as to clear up any confusion for state grantees.

Thank you for your quick attention to this issue. Please give me a call at (206) 837-2972 if you'd like to discuss further.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, December 8, 2025 5:25 PM  
**To:** Wolf, Lucy (ATG) <[Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[Molly.Powell@atg.wa.gov](mailto:Molly.Powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Received – thank you. I will get this on file.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 6:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Please find attached the proposed scheduling order with our signature block.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, December 8, 2025 1:05 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you for the update.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 3:20 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith

(USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

We have circulated the proposed schedule to the multistate and will send our signature block this afternoon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Monday, December 8, 2025 7:25 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you Lucy. That looks good. Please go ahead and add the signature blocks for Plaintiffs. Once those are added I will file.

Thanks,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, December 8, 2025 12:00 AM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline,

Please find attached a redlined version of the proposed scheduling order. We'd like to have the full three weeks to respond to the initial motion and we articulated our preferred oral argument schedule.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Friday, December 5, 2025 1:54 PM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy,

Thank you for your email and the proposed schedule. While it is highly unusual for Defendants to move first in this posture, for the sake of agreeability we are willing to do so here. We do propose the following two changes: (1) filing the administrative record January 16, 2026 and (2) filing Defendants' dispositive motion on January 30, 2026. We will leave it up to you if you would like Plaintiffs to have their full three weeks (pushing the scheduling out one week) or if Plaintiffs are okay with two weeks to respond. If Plaintiffs are okay with the two weeks to respond, the schedule is as

follows:

Friday, Jan 16, 2026: Defendants file Administrative Record  
Friday, Jan 30, 2026: Defendants file dispositive motion  
Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion  
Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion  
Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

I attached a draft stipulation reflecting this schedule. If this draft looks good to Plaintiffs, feel free to add Plaintiffs' signature blocks.

Regarding oral argument, Defendants defer to the Court's decision and the Court's schedule.

Please let me know your thoughts and I am happy to file on Monday.

Thank you and have a good weekend!

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)  
**Sent:** Friday, December 5, 2025 1:18 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Thank you Lucy. We are discussing internally and will get back with you shortly.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Thursday, December 4, 2025 3:44 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Thanks for the time to discuss internally. We're proposing a four brief schedule here, and we're suggesting that Defendants file the first brief. We think that's appropriate since Defendants have yet to respond to the complaint, and Defendants' motion under this schedule will be its response for Rule 12 purposes.

With that understanding, here's a proposed schedule:

Friday, Jan 9, 2026: Defendants file Administrative Record  
Friday, Jan 23, 2026: Defendants file dispositive motion  
Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion  
Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion  
Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

We'd request oral argument on the cross-motions. Is there a date in late March or early April that would work for you?

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Thursday, December 4, 2025 10:17 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thanks Lucy – we look forward to hearing from you.

Best,

**Jacqueline C. Lau**  
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Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, December 3, 2025 2:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline. We are discussing internally and will respond soon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Tuesday, December 2, 2025 1:03 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and AG team,

I want to provide an update from DOJ's side in the State of Washington v. HHS case. There still has not been a decision made regarding appeal, but we agree it would be beneficial to move this case forward by negotiating a cross-dispositive motion briefing schedule. We plan to note we reserve our right to seek a stay if there is a decision to appeal. We spoke with HHS about their timeline to compile the administrative record. They believe they would be ready to produce the AR in the next few weeks. Then, depending on your schedule, we could craft the cross-dispositive motion schedule following an AR production date.

Please let me know your thoughts on negotiating a schedule and I am happy to discuss further. Since our current responsive pleading deadline is December 9, we would like to file any joint schedule before then.

Thanks,

Jacqueline

**Jacqueline C. Lau**

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Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Lau, Jacqueline C (CIV)  
**Sent:** Monday, November 17, 2025 1:52 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email and we appreciate Plaintiffs' position. Right now, Appellate is still considering whether to appeal the preliminary injunction order. We do not have a good sense of whether an appeal is likely or not because of the shutdown.

For now, we will represent that Plaintiffs oppose the motion but consent to a 14-day extension. Once we have a better sense of whether an appeal is likely or not, we will reach back out and then would be happy to negotiate a briefing schedule.

Thank you,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

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Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, November 17, 2025 12:21 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. We're not opposed in principle to an extension for you to respond to the complaint, but would rather that be part of a larger agreement to tee this up for cross-dispositive motions as quickly as possible.

If you're planning on appealing the PI within that window, and then moving to stay proceedings at the district court pending your appeal, then we're unlikely to agree as that could significantly delay an ultimate resolution of the case.

But if we could agree on dates by which we can expect the administrative record, and a briefing schedule following that, then that's something we'd be interested in.

Let us know if an extension to respond to the complaint within the context of a larger case schedule is something that we could agree on. If not, then you can represent that we oppose your motion, but would agree to a smaller extension of 14 days.

Thanks,

Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
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Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, November 17, 2025 7:26 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and Washington AG team,

Following up on the email below. We are planning to file the motion for extension today. Thanks!

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Lau, Jacqueline C (CIV)  
**Sent:** Thursday, November 13, 2025 1:38 PM  
**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for Plaintiffs' response. Now that appropriations have been restored, we will not be filing a stay motion. We are now planning to file a Motion for Extension of Time, to request a 60-day extension of the responsive pleading deadline.

Please let me know Plaintiffs' position on the relief requested above. If Plaintiffs oppose such relief, please let me know if there is any relief short of the 60 days that Plaintiffs would consent to.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, November 12, 2025 1:44 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. Plaintiffs oppose your motion.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Wednesday, November 12, 2025 9:36 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hello All,

Thank you for the introduction, Susanne. It is nice to meet you, Lucy!

Defendants are preparing to file a Motion to Stay in this matter due to the lapse in appropriations and the upcoming notice of appeal deadline for the preliminary injunction order. Defendants are requesting a stay of district court proceedings in the case, including the November 25, 2025 responsive pleading deadline, until Congress restores appropriations or until the notice of appeal deadline has passed, whichever is later.

Defendants propose that the parties file a Joint Status Report 14 days after appropriations are restored or 14 days after the appeal deadline of December 26, 2025, whichever is later, to address next steps.

Please let me know if Plaintiffs consent to or oppose the relief requested in this motion and let me know if you have any questions.

Thank you!

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

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Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Wednesday, November 12, 2025 11:38 AM

**To:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith

(USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Susanne,

Confirming I'll still be the lead attorney and copying others on our team.

Thanks,  
Lucy

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Washington State Office of the Attorney General  
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**From:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Sent:** Wednesday, November 12, 2025 7:50 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Subject:** Washington State v. HHS

[EXTERNAL]

Lucy,

Copied here are Jacqueline Lau and Michelle Bennett. These wonderful attorneys will be taking over the defense of this case. However, Sarah and I will remain on the case in a support role.

Please confirm that you remain the plaintiffs "lead attorney" on this case. Thank you.

**SUSANNE LUSE**  
**CHIEF | CIVIL DIVISION**  
**UNITED STATES ATTORNEY'S OFFICE | DISTRICT OF OREGON**  
1000 SW Third Avenue, Suite 600 | Portland, Oregon 97204  
Office: 503-727-1019 | Cell: 503-351-8704 | Fax: 503-727-1117

# Exhibit I

**From:** [Lau, Jacqueline C \(CIV\)](#)  
**To:** [Wolf, Lucy \(ATG\)](#); [Luse, Susanne \(USAOR\)](#)  
**Cc:** [Chien, Marsha \(ATG\)](#); [Paradis, Kelly A. \(ATG\)](#); [Feldman, Sarah \(USAOR\)](#); [Ramsey, Keith \(USAOR\)](#); [Bennett, Michelle \(CIV\)](#); [McGinty, William \(ATG\)](#); [Powell, Molly \(ATG\)](#); [Diorio, Alexia \(ATG\)](#)  
**Subject:** RE: Washington State v. HHS  
**Date:** Monday, February 9, 2026 1:21:51 PM

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[EXTERNAL]

Hi Lucy,

I would like to provide an update regarding the NOAs and accompanying Supplemental Terms and Conditions transmitted to Plaintiff States which inadvertently included the gender ideology condition. The client is planning to take the following steps:

1. Remove the condition from the NOAs and re-issue the NOAs to Plaintiff States. This will be done today, or tomorrow at the latest. ACF will reference the PI and explain that the prior inclusion of the gender ideology condition was erroneous.
2. Send an additional email informing Plaintiff States that the 2026 Supplemental Terms and Conditions are still forthcoming and that any 2026 Supplemental Terms and Conditions issued to Plaintiff States will not include the Additional Term and Condition at Paragraph 5 regarding gender ideology.

Thank you for bringing this to our attention and please let me know if you have any questions.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)  
**Sent:** Friday, February 6, 2026 5:07 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

Hi Lucy and Crystal,

First, thank you for your latest email. I reached out to the client and they let me know they are looking into it. We will get back with you as soon as possible.

Second, please see our below responses to each category of documents outlined in your email regarding the Administrative Record last night:

**1. Corrupt Files**

I reached out to HHS and requested they re-send/re-upload the three corrupt videos and the ECF 94-7 NJ materials (Bates No. 11422). I will let you know when we receive these materials.

**2. Password Protected Files**

Crystal, I do not see where the Bates stamped "8. CO Draw the Line Respect the Line Materials" was uploaded to the Box. Could you please send a link to where that was uploaded?

**3. Files that need to be downloaded from the link provided**

- a. ECF 93-15 - 51 - MN FLASH and Project MARS Instruction Forms (Bates No. 6955): The directions and log-in information are provided to access this curriculum (which is an online course). It appears this log-in is still current and the online course is still accessible.
- b. ECF 92-5 – MD Power Through Choices Materials (Bates No. 3215): The link and password is provided but the link has expired. Plaintiff Maryland may have an updated link to access this curriculum. If Plaintiff Maryland is able to send over a new link and password, we can download the materials from there.
- c. ECF 95-15 – WA 3Rs Materials (Bates No. 13754). This appears to be curriculum similar to the other States' 3Rs materials. I have asked HHS to download and combine those files.

**4. Placeholder Documents**

- a. I will inquire with HHS regarding "The Dark History of Forced Sterilization" video.
- b. I will inquire with HHS regarding the "Intimate Partner Violence" video.
- c. Confirmed that Bates No. 5715 references video: "44. Grade 10\_Lesson 1\_2 Minutes Will Change the Way You Think About Consent.mp4" and Bates No. 5716 references video: "44. Grade 10\_Lesson 1\_\_Pitch Perfect 2\_ Trailer.mp4."

- d. Confirmed that Bates No. 5130 and Bates No. 6171 reference video “44. Grade 7\_Supplement\_What is Sexual Orientation - LGBTQ+.mp4” and Bates No. 5138 and Bates No. 6219 reference video: “44. Grade 7\_Supplement\_Sex Trafficking\_What is it.mp4.”

## 5. Page orientation issue

Since the Court did request I re-upload one of the documents in the AR but made no mention of page orientation, I am not inclined to inquire with the Court. Absent the Court’s direction, I do not want to continue to file on the docket unnecessarily. If you feel strongly about the page orientation of those two documents, I will leave that to you to request with the Court.

Thank you and please let me know if you have any questions.

Best,

Jacqueline

### Jacqueline C. Lau

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Friday, February 6, 2026 12:08 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

We recently learned that State Grantees received 2026 PREP and SRAE NOAs on January 30, 2026, that included the enjoined “gender ideology” language (“Recipients are prohibited from including gender ideology in any program or service that is funded with this award...”). The 2026 PREP and SRAE NOAs also link to the 2025 Terms and Conditions, which include enjoined language. I’ve attached example NOAs and the linked Terms and Conditions.

As currently drafted, the NOAs and Terms and Conditions violate the court’s injunction in

this case. Our understanding from your email below is that, since the injunction is still in place, the NOAs and Terms and Conditions would not include the enjoined “gender ideology” language. Please reach out to your client to ask them to withdraw and reissue the NOAs without the enjoined language and with links to the updated 2026 Terms and Conditions that do not include paragraph 5.

Please give me a call at (206) 837-2972 if you’d like to discuss further.

Best,  
Lucy

---

**From:** Wolf, Lucy (ATG)  
**Sent:** Monday, January 12, 2026 1:42 PM  
**To:** 'Lau, Jacqueline C (CIV)' <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[Molly.Powell@atg.wa.gov](mailto:Molly.Powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

Thanks Jacqueline. I really appreciate you tracking down this information. Our State Grantees will look forward to that clarifying email from ACF.

Best,  
Lucy

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, January 12, 2026 1:39 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy,

Our client confirmed that the Supplemental Term and Condition at Paragraph 5 regarding gender ideology was an oversight. It is general practice at HHS to include a version of the Supplemental Terms and Conditions to give applicants a sense of what to expect if their application is approved, and this version was from 2025. The 2026

Supplemental Terms and Conditions are still being drafted. If the preliminary injunction is still in effect when Notices of Award are issued, the 2026 Supplemental Terms and Conditions for any plaintiff state will not include Paragraph 5. ACF plans to send an email to state grantees explaining the above, reminding them of the PI, clarifying that states are not bound by the gender ideology clause while the PI is in place, and confirming that inclusion of paragraph 5 was an oversight.

Thank you for bringing this to our attention and please let me know if you have any questions.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)

**Sent:** Monday, January 12, 2026 10:24 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email. We will discuss with our client and get back with you.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Sunday, January 11, 2026 2:11 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

We recently heard from our PREP state grantee that they received an email on Friday January 9, 2026, from Cheri Thompson at ACF seeking a Letter of Intent to request FY 2026 PREP funding. Unfortunately, that email attached Supplemental Terms and Conditions effective October 1, 2025 (attached hereto) that contained language identical to the enjoined Supplemental Terms and Conditions per the Court's October 27, 2025 Order enjoining HHS from "imposing or enforcing the Gender Conditions as defined in the... Supplemental T&Cs or any materially similar terms or conditions as to any PREP or SRAE funds awarded to Plaintiff States..." (Opinion and Order Page 76).

We are hoping that you can reach out to your client to ask them to withdraw and reissue the Supplemental Terms and Conditions without the Gender Conditions so that they can come into compliance with the Court's injunction.

ACF's email asked grant recipients to submit their Letter of Intent by this Tuesday January 13, 2026, and submit various application documents by January 23, 2026. It would be preferable if we could resolve this issue by the January 13 deadline or at the very latest, in advance of the January 23 deadline so as to clear up any confusion for state grantees.

Thank you for your quick attention to this issue. Please give me a call at (206) 837-2972 if you'd like to discuss further.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Monday, December 8, 2025 5:25 PM

**To:** Wolf, Lucy (ATG) <[Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith

(USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[Molly.Powell@atg.wa.gov](mailto:Molly.Powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Received – thank you. I will get this on file.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 6:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Please find attached the proposed scheduling order with our signature block.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Monday, December 8, 2025 1:05 PM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you for the update.

Best,

Jacqueline

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Monday, December 8, 2025 3:20 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

We have circulated the proposed schedule to the multistate and will send our signature block this afternoon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General

(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Monday, December 8, 2025 7:25 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thank you Lucy. That looks good. Please go ahead and add the signature blocks for Plaintiffs. Once those are added I will file.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, December 8, 2025 12:00 AM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline,

Please find attached a redlined version of the proposed scheduling order. We'd like to have the full three weeks to respond to the initial motion and we articulated our preferred oral argument schedule.

Best,  
Lucy

**Lucy Wolf** (she/her)  
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---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Sent:** Friday, December 5, 2025 1:54 PM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy,

Thank you for your email and the proposed schedule. While it is highly unusual for Defendants to move first in this posture, for the sake of agreeability we are willing to do so here. We do propose the following two changes: (1) filing the administrative record January 16, 2026 and (2) filing Defendants' dispositive motion on January 30, 2026. We will leave it up to you if you would like Plaintiffs to have their full three weeks (pushing the scheduling out one week) or if Plaintiffs are okay with two weeks to respond. If Plaintiffs are okay with the two weeks to respond, the schedule is as follows:

Friday, Jan 16, 2026: Defendants file Administrative Record

Friday, Jan 30, 2026: Defendants file dispositive motion

Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion

Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion

Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

I attached a draft stipulation reflecting this schedule. If this draft looks good to Plaintiffs, feel free to add Plaintiffs' signature blocks.

Regarding oral argument, Defendants defer to the Court's decision and the Court's schedule.

Please let me know your thoughts and I am happy to file on Monday.

Thank you and have a good weekend!

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

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Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)

**Sent:** Friday, December 5, 2025 1:18 PM

**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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(USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>;

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<[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** RE: Washington State v. HHS

Thank you Lucy. We are discussing internally and will get back with you shortly.

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

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U.S. Department of Justice, Civil Division

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---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Thursday, December 4, 2025 3:44 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR)

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**Subject:** [EXTERNAL] RE: Washington State v. HHS

Jacqueline,

Thanks for the time to discuss internally. We're proposing a four brief schedule here, and we're suggesting that Defendants file the first brief. We think that's appropriate since Defendants have yet to respond to the complaint, and Defendants' motion under this schedule will be its response for Rule 12 purposes.

With that understanding, here's a proposed schedule:

- Friday, Jan 9, 2026: Defendants file Administrative Record
- Friday, Jan 23, 2026: Defendants file dispositive motion
- Friday, Feb. 13, 2026: Plaintiffs file dispositive motion / response to Defendants' dispositive motion
- Friday, March 6, 2026: Defendants file response to Plaintiffs' dispositive motion / reply in support of Defendants' dispositive motion
- Friday, March 20, 2026: Plaintiffs file reply in support of Plaintiffs' dispositive motion

We'd request oral argument on the cross-motions. Is there a date in late March or early April that would work for you?

Best,  
Lucy

**Lucy Wolf** (she/her)  
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**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Thursday, December 4, 2025 10:17 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
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**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Thanks Lucy – we look forward to hearing from you.

Best,

**Jacqueline C. Lau**  
Trial Attorney  
Federal Programs Branch

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Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, December 3, 2025 2:11 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Thanks Jacqueline. We are discussing internally and will respond soon.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Tuesday, December 2, 2025 1:03 PM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and AG team,

I want to provide an update from DOJ's side in the State of Washington v. HHS case. There still has not been a decision made regarding appeal, but we agree it would be beneficial to move this case forward by negotiating a cross-dispositive motion briefing schedule. We plan to note we reserve our right to seek a stay if there is a decision to appeal. We spoke with HHS about their timeline to compile the administrative record.

They believe they would be ready to produce the AR in the next few weeks. Then, depending on your schedule, we could craft the cross-dispositive motion schedule following an AR production date.

Please let me know your thoughts on negotiating a schedule and I am happy to discuss further. Since our current responsive pleading deadline is December 9, we would like to file any joint schedule before then.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Lau, Jacqueline C (CIV)

**Sent:** Monday, November 17, 2025 1:52 PM

**To:** 'Wolf, Lucy (ATG)' <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for your email and we appreciate Plaintiffs' position. Right now, Appellate is still considering whether to appeal the preliminary injunction order. We do not have a good sense of whether an appeal is likely or not because of the shutdown.

For now, we will represent that Plaintiffs oppose the motion but consent to a 14-day extension. Once we have a better sense of whether an appeal is likely or not, we will reach back out and then would be happy to negotiate a briefing schedule.

Thank you,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Monday, November 17, 2025 12:21 PM

**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. We're not opposed in principle to an extension for you to respond to the complaint, but would rather that be part of a larger agreement to tee this up for cross-dispositive motions as quickly as possible.

If you're planning on appealing the PI within that window, and then moving to stay proceedings at the district court pending your appeal, then we're unlikely to agree as that could significantly delay an ultimate resolution of the case.

But if we could agree on dates by which we can expect the administrative record, and a briefing schedule following that, then that's something we'd be interested in.

Let us know if an extension to respond to the complaint within the context of a larger case schedule is something that we could agree on. If not, then you can represent that we oppose your motion, but would agree to a smaller extension of 14 days.

Thanks,  
Lucy

**Lucy Wolf** (she/her)  
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**Sent:** Monday, November 17, 2025 7:26 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

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<molly.powell@atg.wa.gov>; Diorio, Alexia (ATG) <Alexia.Diorio@ATG.WA.GOV>

**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hi Lucy and Washington AG team,

Following up on the email below. We are planning to file the motion for extension today. Thanks!

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

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**Subject:** RE: Washington State v. HHS

Hi Lucy,

Thank you for Plaintiffs' response. Now that appropriations have been restored, we will not be filing a stay motion. We are now planning to file a Motion for Extension of Time, to request a 60-day extension of the responsive pleading deadline.

Please let me know Plaintiffs' position on the relief requested above. If Plaintiffs oppose such relief, please let me know if there is any relief short of the 60 days that Plaintiffs would consent to.

Thanks,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch  
U.S. Department of Justice, Civil Division  
Phone: (202) 598-0914  
Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

---

**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>  
**Sent:** Wednesday, November 12, 2025 1:44 PM  
**To:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Jacqueline,

Thanks for your email. Plaintiffs oppose your motion.

Best,  
Lucy

**Lucy Wolf** (she/her)  
Assistant Attorney General  
Complex Litigation Division  
Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>  
**Sent:** Wednesday, November 12, 2025 9:36 AM  
**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>; Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>  
**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>  
**Subject:** RE: Washington State v. HHS

[EXTERNAL]

Hello All,

Thank you for the introduction, Susanne. It is nice to meet you, Lucy!

Defendants are preparing to file a Motion to Stay in this matter due to the lapse in

appropriations and the upcoming notice of appeal deadline for the preliminary injunction order. Defendants are requesting a stay of district court proceedings in the case, including the November 25, 2025 responsive pleading deadline, until Congress restores appropriations or until the notice of appeal deadline has passed, whichever is later.

Defendants propose that the parties file a Joint Status Report 14 days after appropriations are restored or 14 days after the appeal deadline of December 26, 2025, whichever is later, to address next steps.

Please let me know if Plaintiffs consent to or oppose the relief requested in this motion and let me know if you have any questions.

Thank you!

Best,

Jacqueline

**Jacqueline C. Lau**

Trial Attorney

Federal Programs Branch

U.S. Department of Justice, Civil Division

Phone: (202) 598-0914

Email: [jacqueline.c.lau@usdoj.gov](mailto:jacqueline.c.lau@usdoj.gov)

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**From:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Sent:** Wednesday, November 12, 2025 11:38 AM

**To:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>; McGinty, William (ATG) <[william.mcginty@atg.wa.gov](mailto:william.mcginty@atg.wa.gov)>; Powell, Molly (ATG) <[molly.powell@atg.wa.gov](mailto:molly.powell@atg.wa.gov)>; Diorio, Alexia (ATG) <[Alexia.Diorio@ATG.WA.GOV](mailto:Alexia.Diorio@ATG.WA.GOV)>

**Subject:** [EXTERNAL] RE: Washington State v. HHS

Hi Susanne,

Confirming I'll still be the lead attorney and copying others on our team.

Thanks,  
Lucy

**Lucy Wolf** (she/her)

Assistant Attorney General

Complex Litigation Division

Washington State Office of the Attorney General  
(206) 837-2972 | [Lucy.Wolf@atg.wa.gov](mailto:Lucy.Wolf@atg.wa.gov)

---

**From:** Luse, Susanne (USAOR) <[Susanne.Luse@usdoj.gov](mailto:Susanne.Luse@usdoj.gov)>

**Sent:** Wednesday, November 12, 2025 7:50 AM

**To:** Wolf, Lucy (ATG) <[lucy.wolf@atg.wa.gov](mailto:lucy.wolf@atg.wa.gov)>

**Cc:** Chien, Marsha (ATG) <[marsha.chien@atg.wa.gov](mailto:marsha.chien@atg.wa.gov)>; Paradis, Kelly A. (ATG) <[kelly.paradis@atg.wa.gov](mailto:kelly.paradis@atg.wa.gov)>; Feldman, Sarah (USAOR) <[Sarah.Feldman@usdoj.gov](mailto:Sarah.Feldman@usdoj.gov)>; Ramsey, Keith (USAOR) <[Keith.Ramsey@usdoj.gov](mailto:Keith.Ramsey@usdoj.gov)>; Bennett, Michelle (CIV) <[Michelle.Bennett@usdoj.gov](mailto:Michelle.Bennett@usdoj.gov)>; Lau, Jacqueline C (CIV) <[Jacqueline.C.Lau@usdoj.gov](mailto:Jacqueline.C.Lau@usdoj.gov)>

**Subject:** Washington State v. HHS

[EXTERNAL]

Lucy,

Copied here are Jacqueline Lau and Michelle Bennett. These wonderful attorneys will be taking over the defense of this case. However, Sarah and I will remain on the case in a support role.

Please confirm that you remain the plaintiffs "lead attorney" on this case. Thank you.

**SUSANNE LUSE**

**CHIEF | CIVIL DIVISION**

**UNITED STATES ATTORNEY'S OFFICE | DISTRICT OF OREGON**

1000 SW Third Avenue, Suite 600 | Portland, Oregon 97204

Office: 503-727-1019 | Cell: 503-351-8704 | Fax: 503-727-1117

# Exhibit J



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2601WAPREP  
FAIN# 2601WAPREP  
Federal Award Date: February 10, 2026

**Recipient Information**

**1. Recipient Name**  
HEALTH, WASHINGTON STATE  
DEPARTMENT OF  
PO Box 47880  
  
OLYMPIA, WASHINGTON 98504 7880

**2. Congressional District of Recipient**  
\*See Remarks

**3. Payment Account Number and Type**  
\*See Remarks

**4. Employer Identification Number (EIN)**  
1911444603A1

**5. Data Universal Numbering System (DUNS)**  
808883128

**6. Recipient's Unique Entity Identifier**  
C16SP2HBR123

**7. Project Director or Principal Investigator**  
Laraine Clardy  
  
laraine.clardy@doh.wa.gov  
360-236-3432

**8. Authorized Official**  
\*See Remarks

---

**Federal Agency Information**

**9. Awarding Agency Contact Information**  
David Lee  
Grants Management Officer  
david.lee@acf.hhs.gov  
202-401-5461

**10. Program Official Contact Information**  
Jerry Milner  
Program Authorizing Official  
ACYF - Family and Youth Services Bureau  
Milner.Jerry@acf.hhs.gov  
111-111-1111

**Federal Award Information**

**11. Award Number**  
2601WAPREP

**12. Unique Federal Award Identification Number (FAIN)**  
2601WAPREP

**13. Statutory Authority**  
Section 513 of the Social Security Act

**14. Federal Award Project Title**  
\*See Remarks

**15. Assistance Listing Number**  
93.092

**16. Assistance Listing Program Title**  
Personal Responsibility Education Program

**17. Award Action Type**  
Supplement

**18. Is the Award R&D?**  
\*See Remarks

| Summary Federal Award   | Financial Information      |
|---|----------------------------|
| <b>19. Budget Period Start Date</b> 10-01-2025                                    | <b>End Date</b> 09-30-2028 |
| <b>20. Total Amount of Federal Funds Obligated by this Action</b>                 | \$0                        |
| 20a. Direct Cost Amount   | *See Remarks               |
| 20b. Indirect Cost Amount Administrative Offset                                   | *See Remarks               |
| 21. Authorized Carryover  | *See Remarks               |
| 22. Offset  | *See Remarks               |
| 23. Total Amount of Federal Funds Obligated this budget period                    | \$378,726.00               |
| <b>24. Total Approved Cost Sharing or Matching, where applicable</b>              | *See Remarks               |
| <b>25. Total Federal and Non-Federal Approved</b>                                 | *See Remarks               |
| <b>26. Project Period Start Date</b> 10-01-2025 -                                 | <b>End Date</b> 09-30-2028 |
| 27. Total Amount of the Federal Award including Approved Cost Sharing or Matching | *See Remarks               |

**28. Authorized Treatment of Program Income**  
\*See Remarks

**29. Grants Management Officer – Signature**

David Lee  
Grants Management Officer

**Footnotes**

In accordance with the preliminary injunction issued in Washington et al. v. HHS (D. Or.), this NOA has been revised to remove the Additional Term and Condition at Paragraph 5 of the Supplemental Terms and Conditions, prohibiting inclusion of gender ideology in any program or services funded with this award, which was included in the prior NOA. This Supplemental Term and Condition will not be applied to your program while the injunction remains in place and including it in the previous NOA issued on January 30 was an oversight on ACF's part.



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2601WAPREP  
FAIN# 2601WAPREP  
Federal Award Date: February 10, 2026

**Recipient Information**

HEALTH, WASHINGTON STATE DEPARTMENT OF  
PO Box 47880  
OLYMPIA, WASHINGTON 98504 7880

**Employer Identification Number (EIN):** 1911444603A1

**Data Universal Numbering System (DUNS):** 808883128

**Recipient's Unique Entity Identifier:** C16SP2HBR123

**Object Class:** 41.15

**Financial Information**

| <u>Appropriation</u> | <u>CAN</u>   | <u>Allotment</u> | <u>Award this action</u> | <u>Cumulative Grant</u> |  | <u>Document Number</u> | <u>Funding Type</u> |
|----------------------|--------------|------------------|--------------------------|-------------------------|--|------------------------|---------------------|
|                      |              |                  |                          | <u>Award to Date</u>    |  |                        |                     |
| 75-X-1512            | 2026,G99SU26 | \$1,133,232.00   | \$0                      | \$378,726.00            |  | 2601WAPREP             | Formula             |

**Terms and Conditions**

This grant award represents an obligation for the ACF Family and Youth Services Bureau State Personal Responsibility Education Program. Funds are subject to the requirements of Section 513 of Social Security Act.

This award is subject to the requirements listed in the terms and conditions. The use of Federal funds from this award constitutes the grantee's acceptance of the listed terms and conditions. The electronic copy of Terms and Conditions to support this program can be found on the website at: <https://acf.gov/grant&s/manage-grant/grant-award/award-terms>.

**Remarks**

\* This field is intended to be included in the standardized Notice of Award and will be displayed in subsequent quarters.

# Exhibit K



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2603ORSRAE  
FAIN# 2603ORSRAE  
Federal Award Date: February 10, 2026

**Recipient Information**

- 1. Recipient Name**  
ADMINISTRATIVE SERVICES OREGON  
DEPARTMENT  
500 Summer Street NE, D-48  
  
SALEM, OREGON 97301
- 2. Congressional District of Recipient**  
\*See Remarks
- 3. Payment Account Number and Type**  
\*See Remarks
- 4. Employer Identification Number (EIN)**  
1936001958A3
- 5. Data Universal Numbering System (DUNS)**  
956343917
- 6. Recipient's Unique Entity Identifier**  
X5QGNEC5ASH4
- 7. Project Director or Principal Investigator**  
William Baney  
  
william.baney@dhsosha.state.or.us
- 8. Authorized Official**  
\*See Remarks

**Federal Agency Information**

- 9. Awarding Agency Contact Information**  
David Lee  
Grants Management Officer  
david.lee@acf.hhs.gov  
202-401-5461
- 10. Program Official Contact Information**  
Jerry Milner  
Program Authorizing Official  
ACYF - Family and Youth Services Bureau  
Milner.Jerry@acf.hhs.gov  
111-111-1111

**Federal Award Information**

- 11. Award Number**  
2603ORSRAE
- 12. Unique Federal Award Identification Number (FAIN)**  
2603ORSRAE
- 13. Statutory Authority**  
The Bipartisan Budget Act of 2018, Title V, Section 2954, Public Law 113-93, 42 US Code 710
- 14. Federal Award Project Title**  
\*See Remarks
- 15. Assistance Listing Number**  
93.235
- 16. Assistance Listing Program Title**  
Sexual Risk Avoidance Education (SRAE)
- 17. Award Action Type**  
Supplement
- 18. Is the Award R&D?**  
\*See Remarks

| Summary Federal Award   | Financial Information      |
|---|----------------------------|
| <b>19. Budget Period Start Date</b> 10-01-2025                                    | <b>End Date</b> 09-30-2027 |
| <b>20. Total Amount of Federal Funds Obligated by this Action</b>                 | \$0                        |
| 20a. Direct Cost Amount   | *See Remarks               |
| 20b. Indirect Cost Amount Administrative Offset                                   | *See Remarks               |
| 21. Authorized Carryover  | *See Remarks               |
| 22. Offset  | *See Remarks               |
| 23. Total Amount of Federal Funds Obligated this budget period                    | \$189,453.00               |
| <b>24. Total Approved Cost Sharing or Matching, where applicable</b>              | *See Remarks               |
| <b>25. Total Federal and Non-Federal Approved</b>                                 | *See Remarks               |
| <b>26. Project Period Start Date</b> 10-01-2025 -                                 | <b>End Date</b> 09-30-2027 |
| 27. Total Amount of the Federal Award including Approved Cost Sharing or Matching | *See Remarks               |

- 28. Authorized Treatment of Program Income**  
\*See Remarks
- 29. Grants Management Officer – Signature**

David Lee  
Grants Management Officer

**Footnotes**

In accordance with the preliminary injunction issued in Washington et al. v. HHS (D. Or.), this NOA has been revised to remove the Additional Term and Condition at Paragraph 5 of the Supplemental Terms and Conditions, prohibiting inclusion of gender ideology in any program or services funded with this award, which was included in the prior NOA. This Supplemental Term and Condition will not be applied to your program while the injunction remains in place and including it in the previous NOA issued on January 30 was an oversight on ACF's part.



Department of Health and Human Services  
Administration for Children and Families

Notice of Award  
Award # 2603ORSRAE  
FAIN# 2603ORSRAE  
Federal Award Date: February 10, 2026

**Recipient Information**

ADMINISTRATIVE SERVICES OREGON DEPARTMENT  
500 Summer Street NE, D-48  
SALEM, OREGON 97301

**Employer Identification Number (EIN):** 1936001958A3

**Data Universal Numbering System (DUNS):** 956343917

**Recipient's Unique Entity Identifier:** X5QGNEC5ASH4

**Object Class:** 41.15

**Financial Information**

| <u>Appropriation</u> | <u>CAN</u>   | <u>Allotment</u> | <u>Award this action</u> | <u>Cumulative Grant</u> |  | <u>Document Number</u> | <u>Funding Type</u> |
|----------------------|--------------|------------------|--------------------------|-------------------------|--|------------------------|---------------------|
|                      |              |                  |                          | <u>Award to Date</u>    |  |                        |                     |
| 75-26-1512           | 2026,G990597 | \$566,885.00     | \$0                      | \$189,453.00            |  | 2603ORSRAE             | Formula             |

**Terms and Conditions**

This grant award represents an obligation for the ACF Family and Youth Services Bureau This grant award represents an obligation for the ACF Family and Youth Services Bureau State Sexual Risk Avoidance Education Program. Funds are subject to the requirements of Section 510 of Social Security Act.

This award is subject to the requirements listed in the terms and conditions. The use of Federal funds from this award constitutes the grantee's acceptance of the listed terms and conditions. The electronic copy of Terms and Conditions to support this program can be found on the website at: <https://acf.gov/grants/manage-grant/grant-award/award-terms>.

**Remarks**

\* This field is intended to be included in the standardized Notice of Award and will be displayed in subsequent quarters.