

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

STATE OF ILLINOIS, *et al.*,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security, *et al.*,

Defendants.

No. 1:25-cv-00495

**JOINT STIPULATION CONVERTING TEMPORARY RESTRAINING ORDER INTO
PRELIMINARY INJUNCTION AND JOINT PROPOSAL FOR BRIEFING SCHEDULE**

The Parties hereby agree, stipulate, and propose to the Court for approval the following:

1. The Parties consent to the conversion of the Court's Modified Temporary Restraining Order issued on October 21, 2025, ECF No. 31, into a Preliminary Injunction to remain in place until the Court reaches a final judgment. The Parties further consent to the extension of the Court's Modified Temporary Restraining Order pending the Court's action on this Joint Stipulation pursuant to Civil Rule 65(b)(2);
2. Plaintiffs shall file an amended complaint on or before October 24, 2025;
3. Defendants may defer responding to the amended complaint until after the Court's ruling on the summary judgment motion(s), to the extent a response is necessary;
4. Defendants shall not be obligated to file an administrative record;
5. The Parties request to dispense with Local Rule 56(a)(1)'s requirement that a motion for summary judgment "be accompanied by a separate Statement of Undisputed Facts";
6. Plaintiffs shall file any motion for summary judgment on or before October 30, 2025;

7. Defendants shall file any response to Plaintiffs' motion for summary judgment, as well as any cross-motion for summary judgment, on or before November 20, 2025;
8. Plaintiffs shall file any response to Defendants' cross-motion for summary judgment, on or before November 28, 2025; and
9. Defendants shall extend the deadline for accepting Homeland Security Grant Program ("HSGP") and Emergency Management Performance Grant ("EMPG") awards until December 31, 2025.

Plaintiffs believe that an expedited schedule that will permit the Court to resolve the motions for summary judgment by the end of 2025, as proposed above, is necessary to preserve their ability to use critical emergency-preparedness support under the HSGP and EMPG programs. Plaintiffs have planned their emergency-preparedness budgets in reliance on timely access to federal funds, and the challenged actions impede their ability to obtain those funds and provide uninterrupted services to their residents. Defendants do not join the preceding two sentences.

The Parties have endeavored to carry as much of the burden of this expedited schedule as possible, but are available to appear for a status conference at the Court's convenience to discuss the schedule in this matter.

Dated: October 24, 2025

Respectfully submitted,

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