



**Office of the New York State
Attorney General**

**Letitia James
Attorney General**

November 13, 2025

By ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *State of New York, et al. v. U.S. Dep't of Education, et al.*, Case
No. 25-cv-2990 (ER) (BCM)**

Dear Judge Ramos:

This Office represents the State of New York in the above-referenced action. We write to report that the parties have come to an agreement that they hope will allow for final resolution of the case without further litigation. On behalf of all parties, we respectfully submit this joint letter motion to request that the Court “so order” the attached Stipulation and [Proposed] Order Staying Case attached as Exhibit A (“Stipulation”).

As detailed in the Stipulation, Defendants agree to: (i) refrain from rescinding the previously-approved liquidation extensions; (ii) use their reasonable, good faith efforts to resolve pending and future payment requests within the time periods prescribed in the Stipulation; and (iii) allow vendor contracts that had not expired as of March 28, 2025 to be extended for up to 67 days to make up for the period between Defendants’ March 28 rescission letter and the Court’s June 3 preliminary injunction order during which Plaintiffs could not make use of their contractors’ services. The parties have further agreed that the case shall remain stayed so long as Defendants abide by these undertakings, and that Plaintiffs shall voluntarily dismiss the case with prejudice once all of payment requests submitted through the expiration of Plaintiffs’ extended liquidation periods have been determined and processed by Defendants.

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The parties accordingly jointly submit to be “so ordered” by the Court the Stipulation setting forth the terms of their agreement and staying the case subject to the agreed-on conditions. The parties appreciate the Court’s consideration of this request to resolve the case in accordance with the terms of the Stipulation.

Respectfully,

/s/ Andrew Amer
Andrew Amer
Special Counsel
Andrew.amer@ag.ny.gov
(212) 416-6127

cc: Counsel of Record (via ECF)