UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU and UNITED STATES OF AMERICA, Plaintiffs, v. COLONY RIDGE DEVELOPMENT, LLC, d/b/a Terrenos Houston, Terrenos Santa Fe, and Lotes y Ranchos; COLONY RIDGE BV, LLC; and COLONY RIDGE LAND, LLC, formerly d/b/a Terrenos Houston and Lotes y Ranchos, Defendants.	)	Case No. 4:23-cv-4729 Hon. Judge Alfred H. Bennett

MOTION OF NATIONAL FAIR HOUSING ALLIANCE, NATIONAL CONSUMER LAW CENTER, UNIDOSUS, PUBLIC JUSTICE, CENTER FOR RESPONSIBLE LENDING, POVERTY AND RACE RESEARCH ACTION COUNCIL, SOUTHERN POVERTY LAW CENTER, AND LEAGUE OF UNITED LATIN AMERICAN CITIZENS FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE* IN OPPOSITION TO JOINT MOTION

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March 3, 2026

I. INTRODUCTION

Pursuant to Fed. R. Civ. P. 7, National Fair Housing Alliance, National Consumer Law Center, UnidosUS, Public Justice, Center for Responsible Lending, Poverty and Race Research Action Council, Southern Poverty Law Center, and League of United Latin American Citizens ("Amici") respectfully request this Court's leave to file the attached memorandum as *amici curiae* in opposition to the parties' Joint Motion for Dismissal, Doc. #149.

II. ARGUMENT

Amici are eight nonprofit organizations dedicated to fair housing and civil rights. Amici seek to file the attached memorandum to provide the Court with additional information and argument that will assist the Court in its consideration of the joint motion.

National Fair Housing Alliance ("NFHA") is a national organization dedicated to ending discrimination and ensuring equal opportunity in housing for all people. Founded in 1988, NFHA is a consortium of 170 private, nonprofit fair housing organizations, state and local civil rights agencies, and individuals. NFHA strives to eliminate housing discrimination and ensure equal housing opportunities through leadership, homeownership, credit access, responsible AI, education, member services, public policy, community development, and enforcement initiatives. Relying on the Fair Housing Act, the Equal Credit Opportunity Act, and other civil rights laws, NFHA undertakes enforcement initiatives in cities and states across the country. It regularly participates as Amicus Curiae in cases involving proper application of these laws.

The nonprofit National Consumer Law Center ("NCLC") works for economic justice for low-income and other disadvantaged people in the U.S. through policy analysis and advocacy, publications, litigation, and training. NCLC has a particular interest in ending discrimination in the credit and housing markets and ensuring the fair and just operation of the judicial system for

consumers. NCLC authors the treatise Credit Discrimination (8th ed. 2022), which addresses the laws at issue in this case. NCLC frequently appears as Amicus Curiae in consumer law cases before trial and appellate courts throughout this country.

UnidosUS is the nation's largest Hispanic civil rights and advocacy organization. Through its unique combination of expert research, advocacy programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges the social, economic, and political barriers that affect Latinos at the national and local levels. UnidosUS identifies and advances solutions that support homeownership opportunities for first-time and first-generation homeowners, including Latino families. Its housing policy agenda focuses on expanding access to responsible credit, boosting the supply of homes affordable to first-time homebuyers and protecting homeownership equity and legacy.

Public Justice is a non-profit legal advocacy organization dedicated to protecting civil, consumer, and workers' rights. As part of that effort, Public Justice has long worked to combat the housing and lending discrimination prohibited by the Fair Housing Act and Equal Credit Opportunity Act and ensure those statutes are properly interpreted and applied.

The Center for Responsible Lending ("CRL") is a non-partisan, nonprofit research and policy advocacy organization working to promote financial fairness and economic opportunity for all and to end predatory lending. CRL brings relevant expertise in consumer protection and discrimination in the lending context, and it works extensively on housing affordability and fair lending issues. CRL's work focuses on those who may be marginalized or underserved by the existing financial marketplace—people who often are targeted for unfair and abusive financial products that leave them worse off.

The Poverty and Race Research Action Council ("PRRAC") is a national civil rights law and policy organization based in Washington, D.C. Its mission is to promote research-based advocacy strategies to address structural inequality and change the systems that disadvantage low-income people of color. PRRAC has worked extensively to preserve the vitality of the Fair Housing Act as a tool for rooting out discrimination that prevents communities of color from attaining equal housing opportunity.

The Southern Poverty Law Center ("SPLC") is a catalyst for racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people. SPLC works to address ongoing harms from racial residential segregation and discriminatory policies that disproportionately deny Black and Brown communities the opportunity to access safe, secure, and affordable housing.

The League of United Latin American Citizens ("LULAC") is the nation's oldest and largest Latino civil rights organization. Founded in 1929, LULAC's mission is to improve the lives of Latino families throughout the United States and to protect their civil rights in all respects. With more than 575,000 members nationwide, LULAC is committed to advancing the rights and opportunities of Latino Americans through advocacy, community building, and education. In particular, LULAC advocates for Latinos to receive a fair chance at homeownership, which is a bedrock of the American dream.

Amici seek leave to file the attached memorandum because they are concerned that the parties' joint motion improperly asks the Court to approve and enforce relief that is unrelated to the pleaded case or the civil rights statutes under which it was brought, even as the proposed settlement fails to provide adequate relief to those harmed by the predatory and discriminatory

scheme at issue. Approving the joint motion thereby would undermine civil rights enforcement and is contrary to the requirement that a "consent decree must spring from and serve to resolve a dispute within the court's subject matter jurisdiction." *Local Number 93, International Assoc. of Firefighters v. Cleveland,* 478 U.S. 501, 525 (1986). Given the lack of adversarial argument on the parties' joint motion, Amici believe that the attached memorandum will be helpful to the Court in considering the motion.

III. CONCLUSION

For the foregoing reasons, this motion should be granted.

Dated: March 3, 2026

Respectfully Submitted,

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* Admitted *Pro Hac Vice*

** Applications to Appear *Pro Hac Vice* submitted to Court pursuant to Local Rule 83.1(I)

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2026, a true and accurate copy of the foregoing motion was electronically filed with the Court using the CM/ECF system. Service on counsel for all parties will be accomplished through the Court's electronic filing system.

/s/ Yiyang Wu

Attorney for Amici

Date: March 3, 2026