



THE COMMONWEALTH OF MASSACHUSETTS  
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May 10, 2019

**VIA ECF**

The Honorable Leo T. Sorokin  
United States District Judge  
John J. Moakley Courthouse  
1 Courthouse Way  
Boston, MA 02210

**Re: *Williams et al. v. DeVos*, Civil Case No. 16-11949**

Dear Judge Sorokin:

I write regarding the pending motion to enforce judgment, or in the alternative, to intervene, Dkt. No. 115, in light of the filing of the Stipulation of Dismissal, Dkt. No. 131.

First, nothing in the Stipulation of Dismissal calls into question the evidence that Plaintiffs previously submitted in their response to the Commonwealth's motion, Dkt. No. 123 at 7–8. In their response, Plaintiffs provided clear evidence that Defendant continues to engage in involuntary collection from students listed on Exhibit 4 of the defense to repayment application submitted by Attorney General Healey to the Secretary dated November 30, 2015 (the "DTR").

Second, since filing its motion, the Commonwealth has obtained additional evidence that Defendant continues to involuntarily collect from students listed in Exhibit 4. For instance, a former Corinthian student listed in Exhibit 4 to the DTR had her tax refund seized on April 24, 2019. This evidence, together with evidence submitted by Plaintiffs, shows that Defendant continues to disregard the DTR and this Court's Order dated October 24, 2018, Dkt. No. 99. *See* Exhibit A, Tax Offset Notice; Exhibit B, Notice of Default.

Thank you for the Court's consideration of this additional information.

Sincerely,

*/s/ Timothy S. Hoitink*

Timothy S. Hoitink  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, Timothy S. Hoitink, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants by First Class Mail.

Dated: May 10, 2019

*/s/ Timothy S. Hoitink*  
Timothy Hoitink