

The Honorable Tiffany M. Cartwright

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

BRIAN TINGLEY,

Plaintiff,

v.

NICHOLAS W. BROWN, et al.,

Defendants.

NO. 3:21-cv-05359-TMC

STIPULATED MOTION FOR
PRELIMINARY INJUNCTION
AND [PROPOSED] ORDER

NOTE ON MOTION CALENDAR:
August 13, 2026

Plaintiff Brian Tingley and Defendants Attorney General Nicholas W. Brown, Department of Health Secretary Dennis Worsham, and Department of Health Assistant Secretary Shawna Fox (State Defendants) hereby stipulate to the following preliminary injunction:

1. During the pendency of this case until the district court enters a final judgment, State Defendants, their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of this order are enjoined from enforcing Wash. Rev. Code § 18.130.180(26) against Plaintiff Brian Tingley's license to practice marriage and family therapy for the provision of talk-only therapy.

2. During the pendency of this case until the district court enters a final judgment, should the Department of Health receive licensing complaints raising allegations that Plaintiff violated Wash. Rev. Code § 18.130.180(26) via the provision of talk-only therapy, State Defendants, their officers, agents, servants, employees, attorneys, and those persons in active

1 concert or participation with them who receive actual notice of this order are enjoined from
 2 requiring Plaintiff Brian Tingley to respond to any part of such licensing complaints made under
 3 Wash. Rev. Code § 18.130.180(26) to the Department of Health.

4 3. Plaintiff Brian Tingley need not provide any security for this stipulated
 5 preliminary injunction.

6 4. In light of this stipulated preliminary injunction, Plaintiff Brian Tingley strikes
 7 his pending Plaintiff's Motion for Preliminary Injunction (Dkt. # 70).

8 5. This stipulation is without prejudice to the respective legal positions of the parties
 9 and does not waive any argument the parties might raise in this litigation. This stipulation
 10 likewise is without prejudice to any right to request modifications or clarifications of the
 11 injunction as the parties may deem appropriate.

12 DATED this 13th day of August 2026.

13 NICHOLAS W. BROWN
 14 Attorney General

15 /s/ Cristina Sepe

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/s/ Kate L. Anderson

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[PROPOSED] ORDER

The Court hereby enters the foregoing stipulated preliminary injunction.

IT IS SO ORDERED.

DATED this 13th day of August 2026.



THE HONORABLE TIFFANY M. CARTWRIGHT
U.S. District Court Judge

1 Presented by:

2 NICHOLAS W. BROWN
3 Attorney General

4 /s/ Cristina Sepe

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