



December 4, 2020

The Honorable Nancy E. Brasel
District of Minnesota
Warren E. Burger Federal Courthouse
316 N. Robert Street
St. Paul, MN 55101

Filed with Court Permission via ECF

RE: *Amici's Supplemental Submission for Heights Apartments v. Walz* (Civ. No. 20-2051)

Dear Judge Brasel:

We write on behalf of *amici curiae* to alert the Court to two recently released studies on the effect of open eviction during the pandemic on COVID-19 infections and deaths.

The first study finds a connection between eviction and health outcomes, and concludes that eviction prevention is a key component of a pandemic control strategy to mitigate COVID-19 spread and death. E. Benfer, D. Vlahov, M. Long, E. Walker-Wells, J. Pottenger, G. Gonsalves, & D. Keene, *Pandemic Housing Policy: Examining the Relationship Among Eviction, Housing Instability, Health Inequity, and COVID-19 Transmission* (November 2020). The authors include professors from Wake Forest University School of Law, Yale University Law School, School of Public Health and School of Nursing, and Columbia University Mailman School of Public Health, to be published in the *Journal of Urban Health*.
<https://ssrn.com/abstract=3736457>.

The second study tested whether lifting eviction moratoria was associated with COVID-19 incidence and mortality. It concluded that “[l]ifting eviction moratoriums was associated with significant increases in COVID-19 incidence and mortality in U.S. states, supporting the public health rationale for use of eviction moratoriums to prevent the spread of COVID-19. Lifting moratoriums amounted to an estimated 433,700 excess cases and 10,700 excess deaths during the study period (March 13-September 3).” K. Leifheit, S. Linton, J. Raifman, G. Schwartz, E. Benfer, F. Zimmerman, & C. Pollack, *Expiring Eviction Moratoriums and COVID-19 Incidence and Mortality* Abstract (November 30, 2020). The authors include professors from University of California, Los Angeles (UCLA), Johns Hopkins University Bloomberg School of Public Health, Boston University, University of California, San Francisco (UCSF) Institute for Health Policy Studies, and Wake Forest University School of Law.
<https://ssrn.com/abstract=3739576>.

The second study includes a table of estimated infections and deaths in states that ended their eviction suspensions. *Id.* at 14. We call the Court’s attention to the data for states with populations similar to Minnesota:

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State[†]	Date Eviction Suspension Ended	Weeks from End of Suspension to September 3, 2020	Estimated Excess Virus Cases after Date Eviction Suspension Ended	Estimated Excess Virus Deaths after Date Eviction Suspension Ended
Maryland (pop. 6,045,680)	July 25, 2020	6	2,310	37
Wisconsin (pop. 5,822,434)	May 26, 2020	14	19,840	346
Colorado (pop. 5,758,736)	June 13, 2020	12	8,620	254
Minnesota (pop. 5,639,632)	<i>Eviction suspension maintained</i>			
South Carolina (pop. 5,148,714)	May 14, 2020	16	37,590	1,090
Alabama (pop. 4,903,185)	May 31, 2020	14	26,470	621
Louisiana (pop. 4,648,794)	June 15, 2020	12	29,650	959

[†]Population estimates from *State Population Totals and Components of Change: 2010-2019* (United States Census Dec. 30, 2019), Annual Estimates of Residential Populations for the United States, Regions, States, and Puerto Rico: Apr. 1, 2010 to July 1, 2019.
<https://www.census.gov/data/tables/time-series/demo/popest/2010s-state-total.html>.

Best regards,

/s/ James W. Poradek
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 Housing Justice Center

/s/ Lawrence R. McDonough
 Lawrence R. McDonough (#151373)
 Lawyers' Committee for Civil Rights Under Law

Cc: Counsel for Plaintiffs and Defendants (via ECF)