



5. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The Government requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations.

6. Opposing counsel states that plaintiffs oppose the motion to stay the case.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government hereby moves for a stay of proceedings in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Date: January 6, 2019

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General

JEAN LIN  
Acting Deputy Branch Director, Federal  
Programs

*s/ Justin M. Sandberg*  
Justin M. Sandberg (Ill. Bar No. 6278377)  
Senior Trial Counsel  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW, Room 11004  
Washington, DC 20005  
Tel.: (202) 514-5838  
Fax: (202) 616-8460  
Email: justin.sandberg@usdoj.gov

*Counsel for Defendants*