

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SHIRA PERLMUTTER,

Plaintiff,

v.

TODD BLANCHE, *et al.*,

Defendants.

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No. 1:25-cv-01659-TJK

UNOPPOSED MOTION TO STAY DEFENDANTS'
DEADLINE TO RESPOND TO COMPLAINT

Defendants hereby move the Court for a stay of the deadline to respond to the Complaint until the Court has ruled on Plaintiff's pending motion for a preliminary injunction. Good cause supports this request, as set forth below:

1. Plaintiff filed her Complaint on May 22, 2025. ECF No. 1.
2. Defendants' response to the Complaint is currently due on August 17, 2025. *See* ECF No. 31.
3. On June 10, 2025, Plaintiff filed a motion for a preliminary injunction, which is currently pending before the Court. ECF No. 24. This Court held a hearing on the motion on July 23, 2025.
4. Defendants respectfully request that the Court stay the deadline to respond to the Complaint until the Court has ruled on Plaintiff's motion for a preliminary injunction. The Court's ruling on the preliminary injunction motion will affect how Defendants proceed with this litigation and choose to respond to the Complaint. Accordingly, staying the deadline to respond to the Complaint until the motion for a preliminary injunction is resolved will conserve party resources

and allow for this litigation to proceed efficiently.

5. Plaintiff consents to the relief requested in this motion.

Dated: July 29, 2025

Respectfully submitted,

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Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General

CHRISTOPHER HALL
Assistant Branch Director
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/s/ Benjamin Hayes

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