

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOE NEGUSE, in his official capacity as a
Member of the U.S. House of
Representatives, *et al.*,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, *et al.*,

Defendants.

Case No. 1:25-cv-2463-JMC

**JOINT MOTION TO EXTEND BRIEFING DEADLINES AND TO STAY RESPONSIVE
PLEADING DEADLINE**

The parties, by and through their undersigned counsel, respectfully move: (1) to extend the deadline for Defendants to respond to Plaintiffs' Motion for Stay under 5 U.S.C. § 705, or in the alternative, for Preliminary Injunction (ECF No. 17) to August 29, 2025; (2) to set the deadline for Plaintiffs to file a reply in support of their Motion on September 12, 2025; and (3) to stay the deadline for Defendants to serve a response pleading pending resolution of Plaintiffs' Motion. As good cause for these requests, the parties state the following:

1. Plaintiffs filed this action on July 30, 2025. *See* ECF No. 1. Plaintiffs subsequently filed a Motion for Stay under 5 U.S.C. § 705, or in the alternative, for Preliminary Injunction on August 8, 2025. *See* ECF No. 17. Plaintiffs served a courtesy copy of the preliminary injunction via email on August 11, 2025. Plaintiffs executed service of the complaint and motion as to the United States Attorney for the District of Columbia on August 13, 2025.

2. An extension of Defendants' deadline to respond to this motion is necessary to accommodate counsels' competing professional obligations and to address thoroughly the complex issues of law presented in Plaintiffs' motion.

3. Because Plaintiffs' Motion for a Stay under 5 U.S.C. § 705, or in the alternative, for Preliminary Injunction implicates many of the legal questions that Defendants anticipate presenting in a responsive pleading, the Parties additionally request that the Court stay Defendants' responsive pleading deadline until thirty days after the Court issues its decision on Plaintiffs' Motion. The Parties submit that staying the responsive pleading deadline until the Court issues its decision will facilitate more concise and targeted submissions, and avoid duplicative filings, preserving both party and judicial resources.

A proposed order is attached.

Dated: August 15, 2025

Respectfully submitted,

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/s/ Alexander W. Resar

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