

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

PFLAG, INC., *et al.*,

Plaintiffs,

V.

Civil Action No. 8:25-cv-337-BAH

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

**JOINT MOTION FOR LIMITED PARTIAL STAY**

The parties respectfully submit this joint motion for a limited partial stay of case deadlines, including Defendants’ April 11, 2025 responsive pleading deadline, pending resolution of Defendants’ interlocutory appeal to the United States Court of Appeals for the Fourth Circuit. The grounds for the motion are as follows:

1. On March 4, 2025, this Court issued a preliminary injunction, enjoining all Defendants except President Trump from “conditioning, withholding, or terminating federal funding under Section 3(g) of Executive Order 14,168 and Section 4 of Executive Order 14,187, based on the fact that a healthcare entity or health professional provides gender-affirming medical care to a patient under the age of nineteen.” Order at 1–2, ECF No. 116.
2. On March 21, 2025, Defendants noticed an appeal of the Court’s preliminary injunction. *See* Notice of Appeal, ECF No. 132.
3. Plaintiffs served their Complaint on the U.S. Attorney’s Office on February 10, 2025, and Defendants’ responsive pleading deadline is therefore April 11, 2025. *See* Fed. R.

Civ. P. 12(a)(2).

4. The parties jointly move for a limited partial stay of case deadlines in this case, including a stay of the answer deadline.
5. Specifically, the parties propose that Defendants' deadline for responding to the Amended Complaint and any deadlines triggered by Rule 16(b), including the submission of a conference report under Rule 26(f), be stayed pending the resolution of Defendants' pending appeal of the preliminary injunction before the Fourth Circuit.
6. The proposed stay of the deadline for Defendants to respond to the Amended Complaint and of the deadlines triggered by Rule 16(b) shall not affect the ability of Plaintiffs to (1) seek leave to amend their Amended Complaint or seek additional preliminary injunctive relief on the basis of further actions by the Government or (2) move to enforce the preliminary injunction during the pendency of the appeal.
7. The parties further propose that within 7 days of the Fourth Circuit panel's decision, the parties file a joint status report advising the Court of their respective positions on whether the partial stay should be continued pending further appellate proceedings before the en banc Fourth Circuit or the Supreme Court.
8. "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes of its docket with economy of time and effort for itself, for counsel, and for litigants. How this can best be done calls for the exercise of judgment, which must weigh competing interests and maintain an even balance."  
*Landis v. N. Am. Co.*, 299 U.S. 248, 254–55 (1936); *Williford v. Armstrong World Indus.*, 715 F.2d 124, 127 (4th Cir. 1983).
9. A partial stay would avoid the unnecessary expenditure of the parties' and Court's

resources during the pendency of Defendants’ appeal, particularly since the Fourth Circuit’s adjudication of the issues on appeal may “have a direct impact on the future course of the case, including on the next decisions this Court must make.” *Int’l Refugee Assistance Project v. Trump*, 323 F. Supp. 3d 726, 732–33 (D. Md. 2018). Further, because the preliminary injunction remains in place and Plaintiffs may still move for district-court relief on the bases outlined above, and because this motion is submitted jointly by the parties, a stay will not prejudice any party.

10. A proposed order is attached.

Dated: April 8, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

MICHELLE BENNETT  
Assistant Branch Director

/s/ Vinita B. Andrapalliyal  
VINITA B. ANDRAPALLIYAL  
Senior Counsel  
CHRISTIAN S. DANIEL  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street NW  
Washington, DC 20530  
Tel.: (202) 305-0845  
vinita.b.andrapalliyal@usdoj.gov  
christian.s.daniel@usdoj.gov

*Counsel for Defendants*

/s/ Omar Gonzalez-Pagan  
Omar Gonzalez-Pagan\*  
**Lambda Legal Defense  
and Education Fund, Inc.**  
120 Wall Street, 19th Floor  
New York, NY 10005

Telephone: (212) 809-8585  
Facsimile: (855) 535-2236  
[ogonzalez-pagan@lambdalegal.org](mailto:ogonzalez-pagan@lambdalegal.org)

*Counsel for Plaintiffs*

*\* Admitted pro hac vice.*