

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

**CITIZENS FOR RESPONSIBILITY AND  
ETHICS IN WASHINGTON,  
1331 F Street, NW, Suite 900  
Washington, D.C. 20004,**

**Plaintiff,**

**v.**

**U.S. CENTERS FOR DISEASE  
CONTROL AND PREVENTION,**

**SUSAN MONAREZ, in her official capacity  
as Acting Director of the U.S. Centers for**

**U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES,**

**ROBERT F. KENNEDY JR., in his official  
capacity as Secretary of the U.S. Department**

**Defendants.**

**Civil No. 25-cv-01020 (TJK)**

**DEFENDANT'S PROPOSED SCHEDULE**

Pursuant to the Court's April 22, 2025 Order, Defendants respectfully request the following schedule:

Defendants' Opposition to the Preliminary Injunction: May 1, 2025

Plaintiff's reply: May 8, 2025

Hearing Date: May 14-15, 2025

Defendant further requests that briefing for the Partial Motion for Summary Judgment be Stayed, until resolution of the Preliminary Injunction. There are several reasons for this request.

First, undersigned counsel has been assigned to this matter yesterday. Second, the undersigned has been informed today that the agency may not be able to accurately respond to the factual allegations asserted in the Partial Motion for Summary Judgment and will require additional time to confirm information. Resolution of the veracity of these alleged facts would assist this Court in adjudicating the merits of this matter. Third, Defendant's proposed schedule would allow the parties time to confer about any remaining issues, after the adjudication of the Preliminary Injunction, possibly refining further the issues before the Court. The intent of Defendant's proposed schedule is not delay but to help ensure that the Court has accurate information from the Parties that will, in turn, aide judicial economy.

Plaintiff, on the other hand has not presented any urgent circumstance, other than speculation, that would require simultaneous briefing. Plaintiff's argument concerning 'denial' of information does not point to any factual scenario that shows that the difference in schedule proposals would result in any more harm than would occur under the normal delays related to usual FOIA productions let alone any evidence of 'irreparable' harm. Accordingly, Defendants respectfully request that the Court adopts Defendants' schedule.

Respectfully submitted,

EDWARD R. MARTIN, JR., D.C. Bar #481866  
United States Attorney

BRIAN P. HUDAK  
Chief, Civil Division

By: \_\_\_\_\_ /s/  
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