## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

THE ASSOCIATED PRESS,

Plaintiff,

v.

TAYLOR BUDOWICH, White House Deputy Chief of Staff, et al.,

Defendants.

Civil Action No. 25-0532 (TNM)

## **CONSENT MOTION TO STAY**

Pursuant to Federal Rule of Civil Procedure 6, Defendants respectfully move to stay further proceedings in this action (except for any future proceedings to enforce the Court's preliminary injunction (ECF No. 46)) pending the result of Defendants' pending appeal. Plaintiff, through counsel, has graciously consented to the relief sought by this motion.

Defendants have appealed the Court's preliminary injunction, and that appeal remains pending. In that appeal, the D.C. Circuit will consider, among other issues, whether Plaintiff has demonstrated a likelihood of success on its claims in this action. The D.C. Circuit's ruling on that issue may likely have a significant impact on the legal underpinnings of Plaintiff's claims or Defendants' defenses in this suit. Accordingly, to conserve the resources of the parties and the Court, Defendants believe it is prudent to stay litigation before this Court (except for any future proceedings to enforce the Court's preliminary injunction) until Defendants' appeal is resolved. Defendants propose that the parties file a joint status report within fourteen days of the D.C. Circuit's resolution of the pending appeal with proposals for further proceedings in this action.

\* \* \*

Dated: April 25, 2025 Washington, DC Respectfully submitted,

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

By: \_\_\_\_\_/s/Brian P. Hudak

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