

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

PHILADELPHIA YEARLY MEETING OF THE
RELIGIOUS SOCIETY OF FRIENDS, et al.,
Plaintiffs-Appellees,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, et al.,
Defendants-Appellants.

No. 25-1512

JOINT MOTION TO MODIFY THE BRIEFING SCHEDULE

Pursuant to Fed. R. App. P. 26(b), the parties jointly request that this Court modify the briefing schedule in this case such that the government's opening brief would be due on August 29, 2025, and the appellees' response brief would be due on October 3, 2025.

1. The government's opening brief is currently due July 30, 2025, and appellees' response brief is currently due August 29, 2025. The government has been granted one 30-day extension of its briefing deadline.

2. In order to accommodate the schedules of counsel, the parties jointly request that the schedule be modified such that the government's

opening brief would be due 30 days later, on August 29, 2025, and the appellees' response brief would be due 35 days later, on October 3, 2025.

3. The extension of time is necessary because Lowell Sturgill, one of the government attorneys assigned to this case, is on leave from July 9 through July 23. In addition, Michael Raab, the government attorney with review responsibility over this case, is responsible for reviewing several appellate matters with impending deadlines including *Ramey LLP v. Small Business Admin.*, No. 24-20533 (5th Cir.) (response brief due July 16, 2025), *VOS Selections v. Trump*, Nos. 25-1812 & 25-1813 (Fed. Cir.) (reply brief due July 18, 2025), *Shop Rite Inc. v. Small Business Admin.*, No. 25-30028 (5th Cir.) (response brief due July 23, 2025), *California v. Trump*, No. 25-3493 (9th Cir.) (response brief due July 28, 2025), and *Webber v. Department of Homeland Security*, No. 25-2717 (9th Cir.) (response brief due July 28, 2025). Mr. Raab also is planning to be on leave July 21 through July 25. Counsel for appellees will also be on leave in late September.

4. For the foregoing reasons, the parties jointly request that the Court modify the briefing schedule as outlined above.

Respectfully submitted,

BRADLEY GIRARD

/s/ Bradley Girard

MICHAEL S. RAAB

LOWELL V. STURGILL JR.

SARAH GOETZ

ALETHEA ANNE SWIFT

J. STERLING MOORE

ANDREW BOOKBINDER

AUDREY WIGGINS

Democracy Forward Foundation

P.O. Box 34553

Washington, DC 20043

(202) 448-9090

/s/ Sarah N. Smith

SARAH N. SMITH

Attorneys

Civil Division, Appellate Staff

U.S. Department of Justice

950 Pennsylvania Ave., N.W., Room 7533

Washington, D.C. 20530

(202) 305-0173

JULY 2025

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), I hereby certify that this motion complies with Federal Rule of Appellate Procedure 27(d)(1)(E) because it was prepared with Palatino Linotype 14-point, a proportionally spaced font with serifs, and the motion complies with Federal Rule of Appellate Procedure 27(d)(2) because it contains 305 words, according to the word count of Microsoft Word.

/s/ Sarah N. Smith

Sarah N. Smith

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2025, I filed and served the foregoing with the Clerk of the Court by causing a copy to be electronically filed via the appellate CM/ECF system. I also hereby certify that the participants in the case are registered CM/ECF users and will be served via the CM/ECF system.

/s/ Sarah N. Smith

Sarah N. Smith