

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CORPORATION FOR PUBLIC  
BROADCASTING,

Plaintiff,

v.

FEDERAL EMERGENCY MANAGEMENT  
AGENCY, et al.,

Defendants.

Civil Action No. 25-0740 (TJK)

**JOINT MOTION TO STAY**

Plaintiff, Corporation for Public Broadcasting, and Defendants, Federal Emergency Management Agency (“FEMA”) and David Richardson in his official capacity as Senior Official Performing the Duties of FEMA Administrator, respectfully submit this joint motion to stay. Pursuant to Local Civil Rule 7(m), the parties have conferred and file this motion jointly.

1. Plaintiff filed the Complaint (ECF No. 1) on March 13, 2025.
2. On July 22, 2025, Defendants moved to dismiss or for summary judgment (ECF No. 38).
3. Pursuant to the Court’s September 16, 2025, Minute Order, Plaintiff’s deadline to respond is September 30, 2025.
4. On August 12, 2025, Plaintiff notified FEMA of its intent to terminate the grants discussed in this litigation as more fully described therein (ECF No. 42-1).
5. FEMA is continuing to assess Plaintiff’s notice. If and upon closeout of the grants, Plaintiff will file a stipulation of dismissal without prejudice.

6. “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936). In deciding whether to stay a case, courts “‘weigh competing interests and maintain an even balance’ between the court’s interests in judicial economy and any possible hardship to the parties.” *Belize Soc. Dev. Ltd. v. Gov’t of Belize*, 668 F.3d 724, 732–33 (D.C. Cir. 2012) (citation omitted).

7. In light of the update provided in ¶¶ 4–5, a brief stay is in the interests of justice.

8. Accordingly, the parties respectfully request that the Court enter the attached proposed order.

Dated: September 22, 2025  
Washington, DC

By: /s/ Joseph D. Lipchitz

Jason W. McElroy (D.C. Bar No.  
502733)

Peter C. Nanov (D.C. Bar No. 230021)  
SAUL EWING LLP  
1919 Pennsylvania Avenue NW, Suite  
550

Washington, D.C. 20006

Tel: (202) 295-6605

jason.mcelroy@saull.com

peter.nanov@saull.com

Jeffrey S. Robbins (Pro Hac Vice  
forthcoming)

Joseph D. Lipchitz (Pro Hac Vice  
forthcoming)

SAUL EWING LLP

131 Dartmouth St.

Suite 501

Boston, MA 02116

Tel: (617) 912-0941

Email: jeffrey.robbs@saull.com

joseph.lipchitz@saull.com

***Counsel for The Corporation for  
Public Broadcasting***

Respectfully submitted,

JEANINE FERRIS PIRRO

United States Attorney

By: /s/ Douglas C. Dreier

DOUGLAS C. DREIER, D.C. Bar #1020234

Assistant United States Attorney

601 D Street, NW

Washington, DC 20530

(202) 252-2551

*Attorneys for the United States of America*