

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

STATE OF MAINE, et al.

Plaintiffs,

v.

NATIONAL OCEANIC AND ATMOSPHERIC
ADMINISTRATION; LAURA GRIMM, in Her
Official Capacity as Chief of Staff performing the
duties of Under Secretary of Commerce for
Oceans and Atmosphere and NOAA
Administrator; UNITED STATES
DEPARTMENT OF COMMERCE; and
HOWARD LUTNICK, in His Official Capacity as
Secretary of Commerce,

Defendants.

No.: 1:25-cv-00324-NT

MOTION FOR STAY IN LIGHT OF LAPSE OF APPROPRIATIONS

The Government hereby moves for a stay of all deadlines in the above-captioned matter:

1. As of the date of this filing, it appears that the appropriations act that had been funding the Department of Justice will expire and that appropriations to the Department of Justice will lapse. It is unknown when funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys are prohibited from working, even on a voluntary basis, except in the very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel therefore requests a stay of the above-captioned matter until Congress has restored appropriations to the Department of Justice.

4. If this motion for a stay is granted, undersigned counsel will notify the court as soon as Congress has appropriated funds for the Department of Justice. The Government requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations.

WHEREFORE, with great regret for any disruption caused to the Court and the other litigants, the Government hereby moves for a stay of this matter until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Dated: October 1, 2025

Respectfully Submitted,

CRAIG M. WOLFF
Acting United States Attorney

By: /s/ John G. Osborn
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CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2025, I electronically filed the foregoing using the CM/ECF system, which will send an electronic notification of such filing to all counsel of record.

Respectfully Submitted,

CRAIG M. WOLFF
Acting United States Attorney

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