

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

UNITED STATES CONFERENCE OF CATHOLIC BISHOPS, <i>Plaintiff,</i> v. UNITED STATES DEPARTMENT OF STATE, et al., <i>Defendants.</i>	Case No. 1:25-cv-465-TNM
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CONSENT MOTION TO STAY PROCEEDINGS

The United States Conference of Catholic Bishops respectfully requests, with the consent of all parties, that this Court stay the proceedings in this case. Following the conclusion of briefing on the pending motions, the Conference and the government entered into an agreement to wind down the Conference’s participation in the government’s refugee resettlement program. A stay would be appropriate while the parties navigate that process before determining what, if any, disputed issues remain unable to be resolved.

“[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); *accord Ruiz v. Millennium Square Residential Ass’n*, 466 F. Supp. 3d 162, 176 (D.D.C. 2020). In deciding whether to issue a stay, the court balances its “interests in judicial economy” with “any possible hardship to the parties.” *Belize Soc. Dev. Ltd. v. Gov’t of Belize*, 668 F.3d 724, 733 (D.C. Cir. 2012). Where there is no “fair possibility that the stay . . . will work damage” to any party or “some one else,” judicial

economy weighs heavily in favor of granting the stay. *Landis*, 299 U.S. at 255; see *Vallejo Ent. LLC v. Small Bus. Admin.*, 2023 WL 3275634, at *3 (D.D.C. May 5, 2023) (granting stay motion where “the harm” to the opposing party was at best “unclear while the efficiency gains [were] clear, certain, and definite”).

A stay here would “result[] in resource savings for both the parties and the [C]ourt” without any risk of harm. *Phil Waldrep Evangelistic Ass’n v. Small Bus. Admin.*, 2023 WL 10553640, at *1 (D.D.C. Mar. 14, 2023). Since the motion to dismiss briefing concluded, the Conference and the government have agreed to discontinue the Conference’s participation in the refugee resettlement program, and the parties have made substantial progress in resolving outstanding payments owed to the Conference for its work and the work of its partner resettlement agencies. The ongoing negotiations may obviate the need for further litigation; at the very least they are likely to “settle” or “simplify” questions of both fact and law should the case need to proceed. *Landis*, 299 U.S. at 256.

In order to give the parties sufficient time to resolve their dispute, and in the service of preserving this Court’s and the parties’ “time and effort,” *Landis*, 299 U.S. at 254, the Conference requests that the Court exercise its discretion to stay all proceedings in this case. The parties will submit periodic status reports informing the Court whether the parties are unable to reach an agreement concerning any outstanding requests. If the parties are unable to resolve any outstanding claims through this wind-down process, the parties will notify the Court and propose further appropriate steps.

July 29, 2025

Respectfully submitted,

/s/ David W. Casazza

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