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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

**PINEROS Y CAMPESINOS
UNIDOS DEL NOROESTE, et al.,**

Case No.: 6:25-cv-00699-AA

Plaintiffs,

v.

**DEFENDANTS' MOTION FOR
STAY IN LIGHT OF LAPSE OF
APPROPRIATIONS**

KRISTI NOEM, et al.,

Defendants.

LOCAL RULE 7-1 CERTIFICATION

Counsel for Defendants certifies that he conferred with counsel for Plaintiffs, and that Plaintiffs position is as follows: Plaintiffs do not oppose a stay for the duration of the shutdown, not to exceed 30 days. The stay will terminate immediately following the conclusion of the shutdown and the parties will agree to meet and confer within 48 hours on the entry of a new scheduling order. Plaintiffs

reserve the right to move the Court to lift the stay if the facts of the case evolve such that delay would significantly compromise the course of justice.

MOTION

Defendants respectfully move for a stay of all case deadlines in the above-captioned case.

DISCUSSION

At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. The Department does not know when funding will be restored by Congress.

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

Defendants therefore request a stay of all case deadlines until Congress has restored appropriations to the Department.

If this motion for a stay is granted, Defendants’ counsel will confer with Plaintiffs’ counsel within 2 business days after Congress has appropriated funds and will promptly thereafter submit a joint status report or a proposed scheduling order.

CONCLUSION

For these reasons, Defendants ask the Court to stay this case until the

Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Respectfully Submitted this 1st day of October 2025.

SCOTT E. BRADFORD
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/s/ Patrick J. Conti
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