

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

RIGHT TO BE, *et al.*,

Plaintiffs,

v.

BONDI, *et al.*,

Defendants.

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Civil Action No. 1:25-CV-03248-APM

**JOINT MOTION TO STAY PROCEEDINGS AND VACATE STATUS
CONFERENCE**

Plaintiffs and Defendants, through their respective undersigned counsel, jointly request that this Court stay all proceedings in this matter until December 1, 2025 and vacate the status conference set for October 6, 2025, conditioned on Defendants' agreement not to re-obligate or otherwise diminish the sums awarded but terminated under Plaintiffs' grant agreement before December 1, 2025.

This Court "has broad discretion to stay proceedings as an incident to its power to control its own docket." *Clinton v. Jones*, 520 U.S. 681, 706 (1997). Good cause exists for this request. The joint nature of this request eliminates the risk of prejudice to either party. Additionally, a stay would promote judicial economy because the D.C. Circuit's forthcoming decision in *Vera Institute of Justice v. U.S. Department of Justice*, 25-5248 (D.C. Cir.), may bear on the claims raised in the complaint. A proposed order is attached.

DATED: October 3, 2025

Respectfully submitted,

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* *Motion for admission pro hac vice forthcoming*