

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

VONDA JONES; ROCHELLE ST. JOHN;
CHRISTINA DAVIES; MARIA GARCIA PAGAN,

Plaintiffs,

v.

CA No.: 1:25-CV-12653-NMG

U.S. DEPARTMENT OF LABOR; LORI CHAVEZ-
DEREMER, in her official capacity as Secretary of
Labor; EMPLOYMENT AND TRAINING
ADMINISTRATION; LORI FRAZIER BEARDEN,
Acting Assistant Secretary of the Employment and
Training Administration; U.S. OFFICE OF
MANAGEMENT AND BUDGET; RUSSELL
BOUGHT, Director of the U.S. Office of Management
and Budget; and UNITED STATES OF AMERICA,

Defendants.

**DEFENDANTS' ASSENTED-TO MOTION FOR A STAY OF ALL PRETRIAL
DEADLINES IN LIGHT OF LAPSE OF APPROPRIATIONS**

Undersigned counsel, on behalf of Defendants in the above-captioned matter, hereby moves for a stay of all pretrial deadlines in the above-captioned case.

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.

1. 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.

2. Undersigned counsel for the Department of Justice therefore requests a stay of all pre-trial deadlines, including the deadlines to respond to Plaintiffs' Motion for Class Certification and to Answer the Complaint, in this case until Congress has restored appropriations to the Department.

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

4. Opposing counsel has authorized counsel for the Government to state that they attest to this motion, based on the Government agency counsel's representation that SCSEP awards are now being made to national grantees, and funds are being made available notwithstanding the shutdown.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government hereby moves for a stay of the United States' pre-trial deadlines until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

Dated: October 24, 2025

By: /s/ Shawna Yen
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: October 24, 2025

By: /s/ Shawna Yen
SHAWNA YEN
Assistant United States Attorney