

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF RHODE ISLAND**

STATE OF NEW JERSEY, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

Civil Action No.
25-cv-404-JJM-AEM

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

IT IS HEREBY STIPULATED and AGREED by and between undersigned counsel, pursuant to Federal Rule of Civil Procedure 6(b) and the Court's October 20, 2025, Text Order Denying [Dkt. 39] Motion to Stay, that:

1. Defendants' time to answer, move to dismiss, or otherwise respond to the Complaint for Declaratory and Injunctive Relief, Dkt. 1, filed on August 18, 2025 ("Complaint"), is extended from October 21, 2025, to December 19, 2025.

2. As set forth below, good cause exists for the agreed extension.

3. The Complaint challenges language in various Notices of Funding Opportunity ("NOFOs") administered by the Office for Victims of Crime ("OVC") within the Department of Justice's Office of Justice Programs ("OJP"). *See* Dkt. 1. On September 23, 2025, counsel for Defendants and Plaintiffs conferred in good faith regarding the timing and scope of litigation, and discussed over twenty additional NOFOs published by OJP components that contained similar language as the OVC NOFOs challenged 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 those appropriations to the

Department lapsed. OJP is impacted by the funding lapse and unable to review pending grant applications, issue new award packages, or issue new NOFOs until the funding lapse ends. Counsel for Defendants and Plaintiffs agree that an extension of Defendants' deadline to respond to the Complaint is prudent in light of the uncertain timing of when OJP and its components will resume orderly functions and the parties' desire to negotiate a case schedule that will allow the Court to resolve the contested issues in the case efficiently.

4. IT IS FURTHER STIPULATED AND AGREED that this extension does not constitute a waiver of any claim, right, or defense.

5. The requested extension will not affect any of the other dates or deadlines that may be set in the case.

Dated: October 20, 2025

Respectfully submitted,

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ATTORNEY GENERAL OF NEW JERSEY

/s/ Mayur P. Saxena

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