

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	Case No. 3:25-cv-1691-DWD
	)	
STATE OF ILLINOIS, ET AL.	)	
	)	
Defendants.	)	
	)	

**MOTION TO STAY DEADLINES
DUE TO LAPSE IN APPROPRIATIONS**

The United States hereby moves to stay upcoming deadlines in this case. In support of this motion, the Government states as follows:

1. 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. The Department does not know when such funding will be restored by Congress.

2. 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.

3. Undersigned counsel for the Department of Justice therefore requests a stay of upcoming deadlines in this case until Congress has restored appropriations to the Department. In particular, the government seeks a stay of the upcoming meet and confer deadline of October 15, 2025, the joint status report of October 30, 2025, and the discovery conference set for November 5, 2025.

4. 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, the discovery conference be reset along with the related deadlines for the meet and confer and joint status report.

5. Opposing counsel has authorized counsel for the Government to state that they have no objection to this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government hereby moves for a stay this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Respectfully submitted,

Dated: October 10, 2025

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