

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

**Rural Development Innovations  
Limited** *et al.*,

Plaintiffs,

v.

**Pete Marocco** *et al.*,

Defendants.

**Civil Case No. 25-cv-1631**

**JOINT STATUS REPORT**

The parties respectfully submit this joint status report in response to this Court's July 22 minute order, which instructed them to "propos[e] to the Court how this case should proceed."

Neither party intends to pursue an appeal of this Court's preliminary-injunction order. The parties agree that further proceedings in this case may be informed by the D.C. Circuit's resolution of the pending appeal in *Aviel v. Gor*, No. 25-5105 (D.C. Cir.). The parties accordingly propose that further proceedings in this case (with one exception, discussed below) be stayed pending a decision in that appeal, and that they be directed to file another joint status report thirty days after the D.C. Circuit issues a decision in that case.

Defendants intend to file a motion to narrow the scope of this Court's preliminary-injunction order. Plaintiffs do not agree that such a motion is warranted. The parties intend to confer further regarding a schedule for briefing the motion.

July 29, 2025

Respectfully submitted,

/s/Bradley Girard

Bradley Girard (DC Bar No. 1033743)  
Joel McElvain (DC Bar No. 448431)  
Robin F. Thurston (DC Bar No. 1531399)  
Skye Perryman (DC Bar No. 984573)  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, DC 20043  
(202) 448-9090  
jmcelvain@democracyforward.org  
bgirard@democracyforward.org  
rthurston@democracyforward.org  
sperryman@democracyforward.org

*Counsel for Plaintiffs*

JEANINE FERRIS PIRRO  
United States Attorney

By: /s/ John J. Bardo  
JOHN J. BARDO, D.C. Bar #1655534  
Assistant United States Attorney  
601 D Street, NW  
Washington, DC 20530  
(202) 870-6770

*Counsel for Defendants*