

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

NANCY CRISMAN, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE, et al.,

Defendants.

Civil Action No. 1:12-cv-01871 (TSC)

* * * * *

PLAINTIFFS' UNOPPOSED MOTION TO STAY BRIEFING

NOW COME Plaintiffs to respectfully ask the Court to stay all briefing of Defendants' Renewed Motion for Summary Judgment, Dkt. #83 (filed July 30, 2020).

Plaintiffs have good cause to request this stay. As stated in the previous motion, the undersigned has been in contact with a potential declarant who would offer relevant testimony. The undersigned can now update the Court that the declarant—a former senior official at the Department of Homeland Security (“DHS”)—has confirmed that they can provide testimony on several issues in controversy in this case. In fact, this witness is in the process of completing a report directly applicable to the testimony they would offer in this case, which would then have to be submitted to DHS for prepublication review. Because it is currently difficult to predict how long this prepublication review process will take, given the potentially sensitive nature of the matters under discussion (watchlists), it would be impractical to continue to request finite extensions. Accordingly, Plaintiffs request that the Court stay all briefing in this case and order Plaintiffs to inform the Court as soon as the prepublication review process has completed.

Defendants do not oppose this Motion. A proposed Order accompanies this Motion.

Date: October 21, 2020

Respectfully submitted,

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