



U.S. Department of Justice

Civil Division

Washington, DC 20044

VIA ECF

November 14, 2025

Honorable Ramon E. Reyes, Jr.
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States of America v. City of New York, et al.*, No. 1:25-cv-04084 (RER) (PK) (E.D.N.Y.)

Dear Judge Reyes:

Plaintiff United States of America submits this letter to respectfully notify the Court that on November 12, 2025, the President signed into law a budget appropriation, and to respectfully propose new deadlines going forward based on Administrative Order 2025-15.

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. On October 1, 2025, counsel for the United States filed a motion to stay the entire case. On October 7, 2025, Defendants filed a response indicating they did not oppose the request. ECF Nos. 14–15.

On October 8, 2025, the Court granted the United States’s motion pursuant to the terms of Administrative Order 2025-15. Administrative Order No. 2025-15, which the Chief United States District Judge issued on October 2, 2025, directed that, “[a]bsent other direction or order from the Court, all civil cases (other than civil forfeiture cases, immigration cases, habeas petitions, or cases requesting temporary restraining orders or other emergency relief) in which the United States Attorney’s Office for the Eastern District of New York or the Department of Justice has appeared as counsel of record for the United States, its agencies, and/or its employees are hereby stayed until two businesses days after the date the President signs into law a budget appropriation that restores Department of Justice funding.” Admin. Order sec. 1. That Administrative Order further “tolled during the duration of the government shutdown and extended thereafter for a period of time equal to the number of calendar days between October 1, 2025 and two business days after the date the President signs into law a budget appropriation that restores Department of Justice funding.” *Id.* sec. 2.

This case, therefore, has been tolled since October 1, 2025. That includes the briefing schedule for Defendants’ motion to dismiss. On November 12, 2025, the President signed into law a budget appropriation that restored Department of Justice funding. The lapse lasted 43 days, and the Administrative Order contemplates a toll adding an additional two business days. Thus, with the consent of Defendants’ counsel, Plaintiff respectfully proposes that the briefing schedule be extended as follows:

- Defendants’ motion to dismiss: December 2, 2025;
- Plaintiff’s response: December 23, 2025;
- Defendants’ reply: January 23, 2026.

Plaintiff greatly appreciates Your Honor's consideration of this request.

cc: All Counsel of Record (via ECF)

Respectfully Submitted,

BRETT A. SHUMATE
Assistant Attorney General
DREW C. ENSIGN
Deputy Assistant Attorney General
CHARLES E.T. ROBERTS
Counsel to the Assistant Attorney General
Civil Division
ELIANIS N. PEREZ
Assistant Director

/s/ Catherine M. Reno
CATHERINE M. RENO
Senior Litigation Counsel
SUSAN ANSARI
Trial Attorney
United States Department of Justice
Civil Division
Office of Immigration Litigation
Attorneys for the United States