

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

REVIER TECHNOLOGIES, INC.,
et al.,

Plaintiffs,

v.

LOEFFLER, *et al.*,

Defendants.

CASE NO. 2:25-cv-02328

JUDGE VANCE

MAG. NORTH

CONSENT MOTION TO STAY

Defendants the United States Small Business Administration (“SBA”); Kelly Loeffler, in her official capacity as Administrator of SBA; United States Department of Justice; and Pamela Bondi, in her official capacity as Attorney General of the United States (collectively, “Defendants”), hereby respectfully request that the Court stay Defendants’ deadline to answer the complaint—for 60 days, until April 14, 2026. Defendants have conferred with Plaintiffs, who consent to the relief requested herein. As good cause for this relief, Defendants represent the following:

1. On November 17, 2025, Plaintiffs filed a complaint alleging SBA’s regulations at 13 C.F.R. § 124.103(b) establishing a presumption of “socially disadvantaged” status based on race violate the equal protection guarantees of the Constitution. *See* Complaint, ECF No. 1.

2. The U.S. Attorney for the Eastern District of Louisiana was served with a copy of the summons and complaint on December 15, 2025. Accordingly, Defendants’ response to the complaint in this action is due February 13, 2026. Fed. R. Civ. P. 12(a)(2).

3. Pursuant to 28 U.S.C. § 530D(a)(1)(B)(ii), the U.S. Department of Justice is still evaluating Plaintiffs’ allegations and claims to determine whether to “refrain (on the grounds that the provision is unconstitutional) from defending or asserting, in any judicial, administrative, or other proceeding, the constitutionality of any provision of any Federal statute, rule, regulation, program, policy, or other law[.]” *Id.*

4. Accordingly, to conserve the parties’ and the Court’s resources, Defendants request that the Court stay all further litigation for 60 days, including Defendants’ February 13, 2026, deadline to respond to the complaint, such that Defendants’ deadline to respond to the complaint would be updated to April 14, 2026.

Dated: February 5, 2026

Respectfully submitted,

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