

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

HARRY DUNN, et al.,
Plaintiffs,

v.

THOMAS AUSTIN, in his official capacity as Architect of the Capitol, et al.,
Defendants.

Civil Action No. 25-1844 (DLF)

**THIRD-PARTY MOVANT CINDY L. YOUNG’S MOTION TO STAY RULING ON
DEFENDANTS’ DISPOSITIVE MOTION PENDING CLARIFICATION OF IDENTIFIED
INDIVIDUALS REFERENCED IN DEFENDANTS’ FILINGS**

Third-Party Movant Cindy L. Young respectfully moves the Court for a limited stay of any ruling on Defendants’ pending dispositive motion until clarification is provided regarding the nature, scope, and composition of the 3,648 individuals referenced in Defendants’ filings.

I. INTRODUCTION

Defendants’ dispositive motion and related filings reference a set of 3,648 identified individuals, yet provide no explanation as to who those individuals are, what roles they occupy, or how—if at all—they relate to the events of January 6, 2021. This ambiguity goes directly to the Court’s ability to adjudicate dismissal on a complete and accurate factual record.

II. PROCEDURAL BACKGROUND

1. On August 19, 2025, Movant filed a Motion to Intervene, which remains pending.
2. On December 9, 2025, Defendants filed a Motion to Dismiss or, in the alternative, for Summary Judgment.
3. Defendants’ filings reference 3,648 individuals without identifying their general classification or relevance.
4. Defendants have acknowledged Movant’s unresolved intervention while continuing merits briefing.

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DEC 30 2025

Clerk, U.S. District & Bankruptcy
Court for the District of Columbia


III. ARGUMENT

Clarification of the referenced individuals is necessary for meaningful judicial review. Proceeding to dismissal without such clarification risks resolving the case on an incomplete factual foundation and prejudices Movant and the integrity of the record.

IV. RELIEF REQUESTED

Movant respectfully requests that the Court stay any ruling on Defendants' dispositive motion pending clarification regarding the nature and composition of the 3,648 individuals referenced, and direct Defendants to provide a brief explanatory statement addressing this issue.

Respectfully submitted,


Cindy L Young

Third-Party Movant, Pro Se