

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CONSUMER FINANCIAL PROTECTION)	
BUREAU, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:23-cv-4729
)	Judge Alfred H. Bennett
COLONY RIDGE DEVELOPMENT,)	
LLC, et al.,)	
)	
Defendants.)	
)	

**UNOPPOSED MOTION TO EXTEND STAY FOR ADDITIONAL SETTLEMENT
DISCUSSIONS IN LIGHT OF LAPSE OF APPROPRIATIONS**

The United States of America hereby moves for an extension of the stay in the above-captioned case.

1. At the end of the day on September 30, 2025, appropriations to the Department of Justice (Department) lapsed. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests an extension of the stay entered in this matter until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The Department requests that, at that point, the stay entered in this matter be extended commensurate with the duration of the

lapse in appropriations (*i.e.*, the current filing date of October 27, 2025 for a status report on settlement negotiations would be extended by the total number of days of the lapse in appropriations).

5. The Department's co-Plaintiff in this matter, the Consumer Financial Protection Bureau, and counsel for Defendants Colony Ridge Development, LLC; Colony Ridge BV, LLC; and Colony Ridge Land, LLC have authorized undersigned counsel to state that they have no objection to this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Department hereby moves for an extension of the stay in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions, including engaging in settlement discussions. A proposed order is attached.

Dated: October 16, 2025

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

CARRIE PAGNUCCO
Chief

VARDA HUSSAIN
Principal Deputy Chief

/s/ Terrence K. Mangan, Jr.
TERRENCE K. MANGAN, JR.
Attorney-in-Charge (*pro hac vice*)
MD Bar No. 2006010006

ABIGAIL B. MARSHAK (*pro hac vice*)
NY Reg. No. 5350053

Housing and Civil Enforcement Section
Civil Rights Division,
U.S. Department of Justice
150 M Street, NE
Washington, DC 20530
Tel: (202) 531-5995
Fax: (202) 514-1116
Email: terrence.mangan2@usdoj.gov
abigail.marshak@usdoj.gov

NICHOLAS J. GANJEI
United States Attorney

DANIEL DAVID HU
Civil Division
Chief

/s/ Elizabeth F. Karpati
ELIZABETH F. KARPATI
SDTX: 20567
TX Bar No. 00794069
Assistant United States Attorney
1000 Louisiana, Suite 2300
Houston TX 77002
Tel: (713) 567-9767
Fax: (713) 718-3303
Email: elizabeth.karpati@usdoj.gov

CERTIFICATE OF CONFERENCE

I hereby certify that the Department of Justice conferred with all parties regarding this Motion to Extend Stay for Additional Settlement Discussions in Light of Lapse of Appropriations prior to filing.

s/ Terrence K. Mangan, Jr.
Terrence K. Mangan, Jr.

Counsel for Plaintiff United States of America

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2025, I filed the foregoing with the CM/ECF system, which sent electronic notice to all counsel of record.

s/ Terrence K. Mangan, Jr.
Terrence K. Mangan, Jr.

Counsel for Plaintiff United States of America