

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

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CITIZENS FOR RESPONSIBILITY AND )  
ETHICS IN WASHINGTON )  
1400 Eye Street, N.W., Suite 450, )  
Washington, DC 20005 )  
) )  
Plaintiff, )  
) )  
v. )  
) )  
U.S. DEPARTMENT OF HOMELAND )  
SECURITY )  
Washington, DC 20528 )  
) )  
Defendant. )

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CIVIL ACTION NO.  
1:09-1101 (EGS)

**DEFENDANT’S UNOPPOSED MOTION TO STAY DEFENDANT’S  
OBLIGATION TO RESPOND TO FIRST AMENDED COMPLAINT**

Defendant U.S. Department of Homeland Security respectfully moves the Court to stay Defendant’s obligation to respond to Plaintiff’s First Amended Complaint. Defendant seeks this stay in light of the ongoing good faith efforts the White House and Plaintiff have made to resolve the issues in this case. A stay will allow the parties to continue this process, and the parties have agreed to file a joint status report by September 8, 2009.

Pursuant to Local Civil Rule 7(m), prior to filing this motion, counsel for Defendant contacted Plaintiff’s counsel, who indicated that Plaintiff would not oppose this motion.

August 21, 2009

Respectfully submitted,

TONY WEST  
Assistant Attorney General

JOHN R. TYLER (D.C. Bar No. 297713)  
Assistant Branch Director

/s/ Lynn Y. Lee

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**[PROPOSED] ORDER**

Upon consideration of Defendant’s Unopposed Motion to Stay Defendant’s Obligation to Respond to First Amended Complaint,

IT IS ORDERED that Defendant’s obligation to respond to Plaintiff’s First Amended Complaint is hereby stayed, and

IT IS FURTHER ORDERED that the parties are directed to file a joint status report with the Court on or before September 8, 2009, updating the Court on the status of their efforts to reach a resolution of this case.

\_\_\_\_\_  
Date

\_\_\_\_\_  
EMMET G. SULLIVAN  
United States District Judge

