

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

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DOGE SERVICE, *et al.*,

Defendants.

Case No. 1:25-cv-00511-CRC

**PLAINTIFF’S UNOPPOSED MOTION FOR STAY OF PARTIAL SUMMARY
JUDGMENT BRIEFING**

Plaintiff Citizens for Responsibility of Ethics (“CREW”) respectfully moves for a stay of all briefing on Defendants’ motion for partial summary judgment, ECF No. 24, pending a ruling on CREW’s motion for expedited discovery, ECF No. 27.

The Court’s March 19 order denying Defendants’ motion for reconsideration and a stay stated that the Court would “order an expedited briefing schedule once USDS files its motion for summary judgment.” ECF No. 23. On March 27, in response to Defendants’ motion for partial summary judgment, CREW filed its motion for expedited discovery, which sought an order “staying all briefing on Defendants’ motion for partial summary judgment, ECF No. 24, pending completion of expedited discovery.” ECF No. 27. The Court then issued a minute order requiring Defendants to respond to CREW’s motion by April 3. ECF No. 28.

Because the Court has not yet issued a briefing schedule for Defendants’ motion for partial summary judgment, and the Court will not rule on CREW’s motion for expedited discovery before CREW’s response to the motion for partial summary judgment is due under Local Rule 7(b), out of an abundance of caution, CREW respectfully requests that the Court stay

all briefing on the motion for partial summary judgment until it rules on CREW's motion for expedited discovery.

Counsel for CREW conferred with Defendants' counsel regarding the relief requested in this motion. Defendants' counsel stated as follows: "Defendants do not object to the motion provided that, as suggested in the Court's order on USDS's motion for reconsideration, *see* ECF No. 23 at 8, USDS will not be required to produce any records in response to the FOIA Request directed to USDS while its motion for summary judgment is pending."

Dated: April 1, 2025

Respectfully submitted,

/s/ Nikhel S. Sus

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[Proposed] Order

Upon consideration of Plaintiff's unopposed motion for stay of partial summary judgement briefing, ECF No. ____, it is hereby:

ORDERED that all briefing on Defendants' motion for partial summary judgment, ECF No. 24, be stayed pending a ruling on Plaintiffs motion for expedited discovery, ECF No. 27.

SO ORDERED.

Date: _____

Hon. Christopher R. Cooper
United States District Judge