

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

**Braidwood Management Inc., et al.,**

Plaintiffs,

v.

**Robert F. Kennedy Jr., et al.,**

Defendants.

Case No. 4:20-cv-00283-O

**JOINT STATUS REPORT AND MOTION TO STAY  
PROCEEDINGS**

The plaintiffs have been preparing a second amended complaint, as well a motion for leave to file a second amended complaint in this litigation. Because of the government shutdown, however, the Department of Justice attorneys who represent the defendants are prohibited from working, even on a voluntary basis, except in very limited circumstances. *See* 31 U.S.C. §§ 1341–42. The parties therefore respectfully ask the Court to stay this case until the government shutdown ends.

When the shutdown concludes and the government reopens, the parties will confer and submit a joint status report to this Court, which will propose a briefing schedule for the plaintiffs' motion for leave to file a second amended complaint.

A proposed order is attached.

Respectfully submitted.

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Dated: October 16, 2025

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### CERTIFICATE OF SERVICE

I certify that on October 16, 2025, I served this document through CM/ECF

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**[PROPOSED] ORDER STAYING PROCEEDINGS UNTIL THE  
GOVERNMENT SHUTDOWN ENDS**

The Court stays all proceedings in this case until the government shutdown ends. When the shutdown concludes and the government reopens, the parties shall confer and submit a joint status report to this Court within fourteen (14) days.

Dated: \_\_\_\_\_

\_\_\_\_\_  
REED O'CONNOR  
UNITED STATES DISTRICT JUDGE