

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

DATA MARKETING PARTNERSHIP, LP,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:19-cv-00800-O
	)	
UNITED STATES DEPARTMENT OF	)	
LABOR, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION TO STAY DEADLINES FOR 60 DAYS  
PENDING SETTLEMENT NEGOTIATIONS**

Plaintiffs Data Marketing Partnership, LP (“DMP”) and LP Management Services, LLC (“LPMS”) and Defendants Department of Labor (“DOL”), Acting Secretary of Department of Labor Keith E. Sonderling, in his official capacity only (the “Secretary”) and the United States of America (“USA”) respectfully file the instant Motion to Stay all Deadlines for 60 days Pending Settlement Negotiations during which the Parties intend to negotiate in good faith to resolve their disputes. As set forth below, the Parties state:

**RELEVANT BACKGROUND**

1. On April 24, 2026, the parties submitted a Joint Status Report and Motion for Extension of Deadlines (ECF No. 100) to resolve discovery disputes in anticipation of a hearing on Defendants’ Motion to Compel. (ECF No. 98).

2. On April 27, 2026, this Court entered an Order requiring Plaintiff to produce documents identified in the Parties’ Joint Status Report by May 8, 2026. (ECF No. 101). The Order also set deadlines for the filing of the Parties’ motions for summary judgment thereafter. *Id.* The Court’s Order was based upon the Parties’ Joint Status Report. (ECF No. 100).

3. While Plaintiffs have produced some of the documents identified in the Parties' Joint Status Report (ECF No. 100), a dispute remains ongoing as to the completeness of the production; however, the Parties believe that postponing the discovery period, as well as the remaining deadlines would be conducive to productive settlement negotiations rather than diverting the Parties' attention and resources away from those discussions. The current discovery period is set to end on June 22, 2026 with Plaintiffs' Motion for Summary Judgment currently due June 29, 2026.

### LEGAL ARGUMENT

4. A district court has the inherent power to control its own docket, including the power to stay proceedings before it. *Clinton v. Jones*, 520 U.S. 681, 706 (1997) ("The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket."); *Kirsch Research and Development, LLC v. IKO Industries, Inc.*, 6:20-cv-00317-ADA, 2021 WL 4555610, at \*1 (W.D. Tex. Oct. 4, 2021).

5. This court has courteously granted multiple extensions to assist the Parties in completing discovery. *See* Doc. 86 (extending discovery to March 2026); Doc. 90 (extending discovery to April 2026); Doc. 101 (extending discovery to June 2026).

6. Now, the Parties seek a limited 60-day stay of all deadlines to facilitate settlement negotiations. At the end of the 60-day stay, the Parties propose 14 days from the end of the stay to resolve ongoing discovery disputes and 30 days from the end of the stay for Plaintiffs to file their Motion for Summary Judgment. This proposed stay will not only allow the Parties to enter into settlement negotiations but also will preserve the Parties' ability to resolve outstanding discovery disputes and adequately prepare and engage in motion practice should settlement efforts not succeed.

7. Maintaining this procedural safeguard ensures that the Parties can resume litigation efficiently, if necessary, while promoting judicial economy and avoiding unnecessary expenditure of resources.

8. This request is made in good faith, not for purposes of delay, and is intended to support the Parties' efforts to resolve this matter efficiently. The requested extension will not affect any scheduled hearings or prejudice any non-parties. No trial date has been set, and the extension is sought solely to facilitate ongoing negotiations that may eliminate the need for further litigation.

9. This request is limited in scope and is not an indefinite request.

10. The Parties hereby make this request for good cause shown.

**WHEREFORE**, the Parties respectfully request this Honorable Court issue an appropriate Order staying these proceedings under the conditions set forth above. The Parties further request this Honorable Court accept this Joint Motion without a supporting memorandum of law as the grounds for granting the Motion are fully stated herein. A proposed Order is submitted via email per the local rules for the convenience of this Honorable Court.

[SIGNATURES ON NEXT PAGE]

Dated: June 18, 2026

Respectfully submitted,

/s/ Allen W. Nelson

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2026, a true and correct copy of the foregoing was electronically served on Plaintiff's counsel of record.

*Allen Nelson, Esq.*

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Allen Nelson, Esq.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

DATA MARKETING PARTNERSHIP, LP	§	
and LP MANAGEMENT SERVICES, LLC	§	
	§	
Plaintiffs,	§	
v.	§	
	§	CIV. ACTION NO. 4:19-cv-00800-O
UNITED STATES DEPARTMENT OF	§	
LABOR, et al.,	§	
	§	
Defendants.	§	
	§	

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**PROPOSED ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_ 2026, upon consideration of the Parties’ Joint Motion to stay all deadlines for 60 days pending settlement negotiations, it is hereby DECREED and ORDERED that the Motion is GRANTED and all deadlines as of the entry of this Order shall be stayed for sixty (60) days from the date of this Order.

Therefore, the Court enters the following scheduling Order:

1. All deadlines in this case set in the Court’s April 27, 2026 Order are stayed for 60 days up through and including the \_\_\_\_ day of \_\_\_\_\_, 2026.
  
2. IT IS FURTHER ORDERED that if and when the stay is lifted, all other deadlines previously set in the Court’s April 27, 2026 Order, shall be reset by the Court with the discovery period to conclude 14 days after the date the stay is lifted and summary judgment motion practice to commence with Plaintiffs’ opening brief 30 days after the date the stay is lifted.
  
3. Defendants will then have 45 days to file their opposition to Plaintiffs’ motion for summary judgment consolidated with Defendants’ cross-motion for summary judgment and Plaintiffs will

have 15 days to file their reply brief in support of their motion for summary judgment consolidated with their opposition to Defendants' cross-motion for summary judgment.

**BY THE COURT:**

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Chief District Judge Reed O'Connor

Agreed as to form:

/s/ Allen W. Nelson

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