

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

LORI CHAVEZ-DEREMER, ACTING
SECRETARY OF LABOR, UNITED
STATES DEPARTMENT OF LABOR,

Plaintiff,

v.

SUFFOLK ADMINISTRATIVE
SERVICES, LLC; PROVIDENCE
INSURANCE CO, I.I.; ALEXANDER
RENFRO; WILLIAM BRYAN; ARJAN
ZIEGER,

Defendants-Counterclaim Plaintiffs.

Civil No.: 3:24-cv-01512 (CVR)

MOTION TO STAY PENDING APPEAL

TO THE HONORABLE COURT:

COME NOW Movants Data Marketing Partnership, LP (“DMP”) and LP Management Services, LLC (“LPMS”) (collectively “Movants”) and respectfully file this Motion to Stay Pending Appeal, and attach their Memorandum in Support.

As explained more fully in the accompanying memorandum, Movants seek to stay the current litigation between the Department of Labor and Defendants-Counterclaim Plaintiffs. As Movants’ Motion to Intervene was denied by this Court on August 14, 2025, Movants now seek a stay of the current proceedings pending its appeal of this denial to the First Circuit Court of Appeals.

Movants are likely to succeed on the merits on appeal, Movants face a significant risk of irreparable injury should the stay not be granted, and granting a stay is in the public interest as the public is interested in preventing government agencies from committing unlawful action. Further, the Department of Labor will likely not be prejudiced by this, as it has had no issue with spending

the last several years engaging in settlement negotiations and long investigations before bringing this current suit. As more fully explained in the memorandum accompanying this Motion, the facts show that Movants are inextricably intertwined with this current litigation such that they will face significant detrimental consequences should this current litigation not be stayed pending a determination on appeal.

WHEREFORE, DMP and LPMS respectfully request the Court to take notice of the above and grant the requested relief.

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 15th day of September, 2025.

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