

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

COMMONWEALTH OF MASSACHUSETTS, )  
*et al.* )

Plaintiffs, )

v. )

NATIONAL INSTITUTES OF HEALTH, *et al.*, )

Defendants. )

Case No. 1:25-cv-10338

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ASSOCIATION OF AMERICAN MEDICAL )  
COLLEGES, *et al.* )

Plaintiffs, )

v. )

NATIONAL INSTITUTES OF HEALTH, *et al.*, )

Defendants. )

Case No. 1:25-cv-10340

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ASSOCIATION OF AMERICAN )  
UNIVERSITIES, *et al.* )

Plaintiffs, )

v. )

DEPARTMENT OF HEALTH AND HUMAN )  
SERVICES, *et al.*, )

Defendants. )

Case No. 1:25-cv-10346

**DEFENDANTS' ASSENTED-TO MOTION TO STAY ALL DEADLINES**

Defendants in the above-captioned cases respectfully request, with the assent of the Plaintiffs, that the Court stay all deadlines pending a ruling on their Assented-to Motion to Convert and to Enter Final Judgment.

Good cause exists for this request. Plaintiffs filed suit on February 10, 2025 and promptly moved for temporary restraining orders. *Commonwealth of Massachusetts, et al. v. National Institutes of Health, et al.*, Case No. 1:25-cv-10338 (Doc. Nos. 1, 4); *Association of American Medical Colleges (AAMC), et al. v. National Institutes of Health, et al.*, Case No. 1:25-cv-10340 (Doc. Nos. 1, 5); and *Association of American Universities (AAU), et al. v. Department of Health and Human Services, et al.*, Case No. 1:25-cv-10346 (Doc. Nos. 1, 2).

Counsel for defendants appeared in *Massachusetts v. NIH* on February 11, 2025 and appeared in both *AAMC v. NIH* and *AAU v. HHS* on February 12, 2025. *See Mass. v. NIH*, Doc No. 25; *AAMC v. NIH*, Doc No. 7; *Mass. v. NIH*, Doc No. 45; *AAMC v. NIH*, Doc No. 14. Under the local rules, the court may set a scheduling conference to occur within 60 days of defendants' appearance, LR16.1(a), and the parties must confer at least 21 days before that conference, LR 16.1(b). These deadlines would be obviated by the relief requested in the Defendants' Assented-to Motion to Convert and to Enter Final Judgment.

Similarly, the need for defendants to respond to plaintiffs' complaints would be obviated by the relief requested in the Defendants' Assented-to Motion to Convert and to Enter Final Judgment. Plaintiffs served the complaints on the U.S. Attorney for the District of Massachusetts on February 13, 2025. Accordingly, without a stay of all deadlines, defendants' responses are due April 14, 2025. *See Fed. R. Civ. P. 12(a)(3)*.

No party will be prejudiced by the relief requested in this motion, and it will conserve the parties' and the Court's resources.

For the foregoing reasons, the Defendants respectfully ask the Court to grant this Assented-to Motion.

Dated: April 4, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: April 4, 2025

/s/ Thomas W. Ports, Jr.

Thomas W. Ports, Jr.