

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

ASSOCIATION OF AMERICAN
UNIVERSITIES, *et al.*,

Plaintiffs,

v.

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

Defendants.

Case No. 1:25-cv-10346

**JOINT MOTION TO EXTEND DEADLINES REGARDING AAU'S MOTION FOR
ATTORNEYS' FEES AND DEFENDANTS' MOTION FOR LIMITED DISCOVERY
AND FOR LEAVE TO FILE REPLIES**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1(b)(2), Plaintiff Association of American Universities (“AAU”) and Defendants seek to extend upcoming deadlines to respond to outstanding motions, and pursuant to Local Rule 7.1(b)(3), AAU and Defendants seek leave to file reply briefs. Under the current rules, AAU’s response to Defendants’ Motion for Leave to Conduct Limited Discovery would be due this Friday, June 5, and Defendants’ response to AAU’s Motion for Attorneys’ Fees would be due June 10. In order to facilitate the orderly resolution of the issues raised in these motions, the parties jointly propose the following schedule:

- June 15, 2026 – AAU’s Response to Defendants’ Motion for Leave to Conduct Limited Discovery
- June 22, 2026 – Defendants’ Reply in Support of Its Motion for Leave to Conduct Limited Discovery
- June 24, 2026 – Defendants’ Response to AAU’s Motion for Attorneys’ Fees

- July 8, 2026 – AAU’s Reply in Support of Its Motion for Attorneys’ Fees

Granting the requested schedule is supported by good cause. The parties are currently litigating similar motions for attorneys’ fees in other matters, in which each side is raising similar arguments. The schedule proposed above will allow the parties to better coordinate their respective responses to avoid unnecessary or duplicative briefing. And based on the briefing in those other cases and current and anticipated briefing in this case, Defendants anticipate that a reply brief in support of its discovery motion will be necessary to respond to AAU’s arguments, and AAU anticipates a reply brief in support of its attorneys’ fees motion will be necessary to allow it to respond to Defendants’ arguments.

WHEREFORE, AAU and Defendants respectfully request that the Court grant their joint motion and order the briefing schedule laid out above.

Dated: June 4, 2026

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2026, I caused the foregoing to be electronically filed with the clerk of the court for the U.S. District Court for the District of Massachusetts, by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record, a true and correct copy of the foregoing instrument and all attachments.

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