

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

AMERICAN ASSOCIATION OF PHYSICIANS
FOR HUMAN RIGHTS, INC. d/b/a GLMA:
HEALTH PROFESSIONALS ADVANCING
LGBTQ+ EQUALITY, *et al.*,

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH, *et al.*,

Defendants.

Civ. A. No. 25-cv-1620-LKG

**UNOPPOSED MOTION FOR A STAY OF ALL CASE DEADLINES IN LIGHT OF
LAPSE OF APPROPRIATIONS**

Defendants hereby move for a stay of the remaining case deadlines set forth in the Joint Status Report (ECF No. 100)¹ in the above-captioned case and state as follows:

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. The same is true for several other Executive agencies, including the National Institutes of Health (“NIH”). The Department does not know when funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys and employees of NIH are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

¹ The parties filed a Joint Status Report on September 26, 2025, proposing a schedule for the remainder of this case. ECF No. 100. Though the Court has not yet approved the proposed schedule, for purposes of this Unopposed Motion Defendants treat the proposed deadlines as if they were approved by the Court.

3. Undersigned counsel for the Department of Justice therefore requests a stay of the remaining case deadlines in the Joint Status Report (ECF No. 100) until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The United States requests that, at that point, all case deadlines for the parties be extended commensurate with the duration of the lapse in appropriations.

5. Opposing counsel has authorized counsel for Defendants to state that Plaintiffs do not oppose this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Defendants hereby move for a stay the remaining deadlines in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

A proposed order is attached.

Respectfully submitted,

KELLY O. HAYES
United States Attorney

/s/

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 14, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notice of such filing to all parties.

_____/s/_____
Michael J. Wilson

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ORDER

UPON CONSIDERATION of the Unopposed Motion to Stay filed by the Defendants, it is this _____ day of _____, 2025, by the United States District Court for the District of Maryland, hereby

ORDERED that the Unopposed Motion is **GRANTED**, and it is further,

ORDERED that deadlines set forth in the Joint Status Report (ECF No. 100) are hereby **STAYED**, and it is further,

ORDERED that the Defendants **SHALL FILE** a status report when funding has been restored to the Department of Justice, indicating the new deadlines for this case as described in the Unopposed Motion.

Hon. Lydia Kay Griggsby
United States District Judge