

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

STATE OF COLORADO, *et al.*,

Plaintiffs,

*v.*

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

Defendants.

Civil Action No.  
25cv121-MSM-AEM

**JOINT MOTION FOR STAY OF ALL CASE DEADLINES**

The parties, by and through their undersigned counsel, respectfully move the Court to enter a stay of all case deadlines for 50 days (*i.e.*, up through and including Monday, January 30, 2026). As outlined below, good cause exists to grant such a stay:

1. On April 1, 2025, Plaintiffs filed this case (ECF 1) and moved for a temporary restraining order (ECF 4), which the Court entered by text order on April 3, 2025, as well as on April 5, 2025 (ECF 54). Plaintiffs amended their complaint on April 8, 2025. ECF 59. The parties then filed initial and supplemental briefs concerning the Plaintiffs' preliminary-injunction motion between April 8 and 24, 2025. ECF 60, 68, 69, 80, 81.

2. On May 16, 2025, the Court granted Plaintiffs' motion for a preliminary injunction. ECF 84. Defendants have notified the Court (ECF 85) of their compliance with the Court's Preliminary Injunction Order, which remains in force through today.

3. The Defendants presently have until December 12, 2025, to respond to the Complaint. Text Order (Oct. 27, 2025).

4. "It is beyond cavil that . . . federal district courts possess the inherent power to stay pending litigation when the efficacious management of court

dockets reasonably requires such intervention.” *Marquis v. FDIC*, 965 F.2d 1148, 1154 (1st Cir. 1992). “Of course, stays cannot be cavalierly dispensed: there must be good cause for their issuance; they must be reasonable in duration; and the court must ensure that competing equities are weighed and balanced.” *Id.* at 1155.

5. Good cause exists to grant the requested stay in this action. The parties have conferred in good faith and are actively working to negotiate, and then to present to the Court, a proposed schedule to allow for:

- a. Defendant to produce the Administrative Record;
- b. The parties to consider a reasonable schedule for briefing on cross-motions for summary judgment upon achieving a mutual understanding of the Administrative Record’s contents;
- c. A potential stay (beyond the stay requested herein) of the Defendant’s obligation to answer Plaintiffs’ Amended Complaint pending the Court’s ruling on summary judgment.

6. The parties also are engaged in active discussions about potential ways to minimize the burden, review, and production of the Administrative Record through a possible, negotiated stipulation. The parties will continue those discussions during the proposed stay.

7. A stay of 50 days is reasonable in duration. Aside from the December 12, 2025, deadline in this case, no other deadlines have yet been established in this case given its early preliminary posture.

8. Finally, the competing equities support issuance of a stay. As noted above, the parties jointly move for this stay. Consistent with the Court’s previous balancing of the equities when adjudicating the Plaintiffs’ Motion for a Preliminary Injunction, the Court’s order granting that Motion will remain in effect

during the pendency of a stay. Issuance of the stay will also conserve the parties' resources and those of the Court.

WHEREFORE, the parties respectfully request that the Court enter an order (1) staying further proceedings in this case and (2) instructing the parties to file a joint status report on January 30, 2026, that will advise the Court of the parties' views on what further proceedings (and their proposed schedule) may be necessary to secure the just, speedy, and inexpensive determination of this action.

Dated: December 12, 2025

Respectfully submitted,

**U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES; ROBERT F. KENNEDY, JR.**, in his official capacity as Secretary of Health and Human Services,

By their attorneys,

**SARA MIRON BLOOM**  
First Assistant United States  
Attorney

*/s/ Kevin Bolan*  
**KEVIN BOLAN**  
Assistant U.S. Attorney  
One Financial Plaza, 17th Floor  
Providence, RI 02903  
401.709.5029  
kevin.bolan@usdoj.gov

**PHILIP J. WEISER**  
Attorney General of Colorado

By: */s/ David Moskowitz*  
David Moskowitz\*  
*Deputy Solicitor General*  
Sam Wolter\*  
*Assistant Attorney General*  
1300 Broadway, #10  
Denver, CO 80203  
(720) 508-6000  
David.Moskowitz@coag.gov  
Samuel.Wolter@coag.gov

*Counsel for the State of Colorado*

**PETER F. NERONHA**  
Attorney General of Rhode Island

By: */s/ Sarah W. Rice*  
Sarah W. Rice (RI Bar No. 10465)  
*Deputy Chief, Public Protection Bureau*  
*Assistant Attorney General*  
Keith Hoffmann (RI Bar No. 9874)  
*Chief of Policy*  
*Assistant Attorney General*  
Julia Harvey (RI Bar No. 10529)  
*Special Assistant Attorney General*  
150 South Main Street  
Providence, RI 02903  
(401) 274-4400, Ext. 2054  
srice@riag.ri.gov  
khoffmann@riag.ri.gov  
jharvey@riag.ri.gov

*Counsel for the State of Rhode Island*

**ROB BONTA**

Attorney General of California

By: /s/ Crystal Adams

Neli Palma\*

*Senior Assistant Attorney General*

Crystal Adams\*

Anna Rich\*\*

*Deputy Attorneys General*

1300 I Street

Sacramento, CA 95814

(916) 210-7522

*Counsel for the State of California*

**NICHOLAS W. BROWN**

Attorney General of Washington

By: /s/ Ellen Range

Ellen Range\*

*Assistant Attorney General*

Office of the Washington State Attorney

General

7141 Cleanwater Drive SW

P.O. Box 40111

Olympia, WA 98504-0111

(360) 709-6470

Ellen.Range@atg.wa.gov

Cristina Sepe\*

*Deputy Solicitor General*

1125 Washington Street SE

PO Box 40100

Olympia, WA 98504-0100

(360) 753-6200

Cristina.Sepe@atg.wa.gov

*Counsel for the State of Washington*

**KEITH ELLISON**

Attorney General of Minnesota

By: /s/ Brian S. Carter

Brian S. Carter\*

Jennifer Moreau\*

*Assistant Attorneys General*

445 Minnesota Street, Suite 1400

St. Paul, Minnesota, 55101

(651) 300-7403

Brian.Carter@ag.state.mn.us

Jennifer.Moreau@ag.state.mn.us

*Counsel for the State of Minnesota*

**KRISTIN K. MAYES**

Attorney General of Arizona

By: /s/ Mary M. Curtin

Mary M. Curtin\*

*Senior Litigation Counsel*

Arizona Attorney General's Office

2005 North Central Avenue

Phoenix, Arizona 85004

(602) 542-3333

Mary.Curtin@azag.gov

*Counsel for the State of Arizona*

**WILLIAM TONG**  
Attorney General of Connecticut

By: /s/ Andrew Ammirati  
Andrew Ammirati\*  
*Assistant Attorney General*  
165 Capitol Avenue  
Hartford, CT 06106  
Phone: (860) 808 5090  
Andrew.Ammirati@ct.gov

*Counsel for the State of Connecticut*

**BRIAN L. SCHWALB**  
Attorney General for the District of Columbia

By: /s/ Samantha Miyahara Hall  
Samantha Miyahara Hall\*  
*Assistant Attorney General*  
Public Advocacy Division  
Office of the Attorney General for the District of Columbia  
400 Sixth Street, N.W.  
Washington, D.C. 20001  
(202) 788-2081  
Samantha.hall@dc.gov

*Counsel for the District of Columbia*

**KATHLEEN JENNINGS**  
Attorney General of Delaware

By: /s/ Vanessa L. Kassab  
Ian R. Liston\*\*  
*Director of Impact Litigation*  
Vanessa L. Kassab\*\*  
*Deputy Attorney General*  
Delaware Department of Justice  
820 N. French Street  
Wilmington, DE 19801  
(302) 683-8899  
vanessa.kassab@delaware.gov

*Counsel for the State of Delaware*

**ANNE E. LOPEZ**  
Attorney General of Hawai‘i

By: /s/ Kaliko‘onālani D. Fernandes  
David D. Day\*  
*Special Assistant to the Attorney General*  
Kaliko‘onālani D. Fernandes\*  
*Solicitor General*  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360  
kaliko.d.fernandes@hawaii.gov

*Counsel for the State of Hawai‘i*

**KWAME RAOUL**  
Attorney General of Illinois

By: /s/ John Hazinski  
John Hazinski\*  
*Assistant Attorney General*  
Office of the Illinois Attorney General  
115 S. LaSalle St.  
Chicago, IL 60603  
(773) 590-6944  
john.hazinski@ilag.gov

*Counsel for the State of Illinois*

**OFFICE OF THE GOVERNOR *ex rel. ANDY BESHEAR***  
in his official capacity as Governor of  
the Commonwealth of Kentucky

By: /s/ Travis Mayo  
S. Travis Mayo\*  
*General Counsel*  
Taylor Payne\*  
*Chief Deputy General Counsel*  
Laura C. Tipton\*  
*Deputy General Counsel*  
Kentucky Office of the Governor  
700 Capitol Avenue, Suite 106  
Frankfort, KY 40601  
(502) 564-2611  
travis.mayo@ky.gov  
taylor.payne@ky.gov  
laurac.tipton@ky.gov

*Counsel for the Office of the Governor*

**AARON M. FREY**  
Attorney General of Maine

By: /s/ Margaret Machaiek  
Margaret Machaiek\*  
*Assistant Attorney General*  
Office of the Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Tel.: 207-626-8800  
Fax: 207-287-3145

*Counsel for the State of Maine*

**ANDREA JOY CAMPBELL**  
Attorney General of Massachusetts

By: /s/ Katherine B. Dirks  
Katherine B. Dirks\*  
*Chief State Trial Counsel*  
Phoebe Lockhart\*  
Assistant Attorney General  
1 Ashburton Pl.  
Boston, MA 02108  
(617.963.2277)  
katherine.dirks@mass.gov  
phoebe.lockhart@mass.gov

*Counsel for the Commonwealth of  
Massachusetts*

**ANTHONY G. BROWN**  
Attorney General of Maryland

By: /s/ James C. Luh  
James C. Luh\*  
Senior Assistant Attorney General  
Office of the Attorney General  
200 Saint Paul Place, 20th Floor  
Baltimore, Maryland 21202  
410-576-6411  
jluh@oag.state.md.us

*Counsel for the State of Maryland*

**DANA NESSEL**  
Attorney General of Michigan

By: /s/ Jennifer M. Jackson  
Jennifer M. Jackson (P67126)\*  
Carl Hammaker (P81203)\*  
Assistant Attorneys General  
Michigan Department of Attorney  
General  
Attorneys for State of Michigan  
525 W. Ottawa St.  
Lansing, MI 48933-1067  
517.335.7573  
jacksonj5@michigan.gov  
hammakerc@michigan.gov

*Counsel for the State of Michigan*

**AARON D. FORD**  
Attorney General of Nevada

By: /s/ Heidi Parry Stern  
Heidi Parry Stern (Bar. No. 8873)\*  
*Solicitor General*  
Office of the Nevada Attorney General  
1 State of Nevada Way, Ste. 100  
Las Vegas, NV 89119  
HStern@ag.nv.gov

*Counsel for the State of Nevada*

**RAÚL TORREZ**  
Attorney General of New Mexico

By: /s/ Anjana Samant  
Anjana Samant\*  
*Deputy Counsel*  
New Mexico Department of Justice  
408 Galisteo Street  
Santa Fe, New Mexico 87501  
asamant@nmdoj.gov  
(505) 270-4332

*Counsel for the State of New Mexico*

**JEFF JACKSON**  
Attorney General of North Carolina

By /s/ Daniel P. Mosteller  
Daniel P. Mosteller\*  
*Associate Deputy Attorney General*  
Laura Howard  
*Chief Deputy Attorney General*  
North Carolina Department of Justice  
PO Box 629  
Raleigh, NC 27602  
919-716-6026  
dmosteller@ncdoj.gov

*Counsel for State of North Carolina*

**MATTHEW J. PLATKIN**  
Attorney General of New Jersey

By: /s/ Jessica L. Palmer  
Jessica L. Palmer\*  
Anaiis Gonzales\*  
*Deputy Attorneys General*  
Office of the Attorney General  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
(609) 696-4607  
Jessica.Palmer@law.njoag.gov  
Anaiis.Gonzales@law.njoag.gov

*Counsel for the State of New Jersey*

**LETITIA JAMES**  
Attorney General of New York

By: /s/ Rabia Muqaddam  
Rabia Muqaddam\*  
*Special Counsel for Federal Initiatives*  
Gina Bull\*  
*Assistant Attorney General*  
28 Liberty St.  
New York, NY 10005  
(929) 638-0447 rabia.muqaddam@ag.ny.gov  
gina.bull@ag.ny.gov

*Counsel for the State of New York*

**DAN RAYFIELD**  
Attorney General of Oregon

By: /s/ Deanna J. Chang  
Deanna J. Chang\*  
*Senior Assistant Attorney General*  
100 SW Market Street  
Portland, OR 97201  
(971) 673-1880  
Deanna.J.Chang@doj.oregon.gov

*Counsel for the State of Oregon*

**JOSH SHAPIRO**

in his official capacity as Governor of the Commonwealth of Pennsylvania

Jennifer Selber  
*General Counsel*

By: /s/ Aimee D. Thomson

Aimee D. Thomson\*  
Jonathan D. Koltash\*  
*Deputy General Counsel*  
Pennsylvania Office of the Governor  
30 N. 3rd St., Suite 200  
Harrisburg, PA 17101  
(223) 234-4986  
aimeethomson@pa.gov  
jokoltash@pa.gov

*Counsel for Governor Josh Shapiro*

\*Admitted pro hac vice

\*\*Pending pro hac vice applications to be filed

**JOSHUA L. KAUL**

Attorney General of Wisconsin

By: /s/ Lynn K. Lodahl

Lynn K. Lodahl\*  
*Assistant Attorney General*  
17 West Main Street  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 264-6219  
lodahllk@doj.state.wi.us

*Counsel for the State of Wisconsin*

**CERTIFICATE OF SERVICE**

I hereby certify that, on December 12, 2025, I filed the foregoing document through this Court's Electronic Case Filing (ECF) system, thereby serving it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E) and Local Rule Gen 304.

/s/ Kevin Bolan

KEVIN BOLAN  
Assistant U.S. Attorney