

**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 TO EXTEND 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 an additional 34 days (*i.e.*, up through and including Wednesday, March 4, 2026). As outlined below, good cause exists to extend the 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. On December 12, 2025, the parties jointly moved to stay this case (ECF 100) through January 30, 2026, to facilitate the parties discussions concerning 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 stay of the Defendant's obligation to answer Plaintiffs' Amended Complaint pending the Court's ruling on summary judgment.

4. The Court granted that motion by text order on December 17, 2025.

5. The parties continue to discuss the preceding subjects, and will continue those discussions during the proposed stay extension.

6. A 34-day extension of the stay is reasonable in duration. No other deadlines have yet been established in this case given its early preliminary posture.

7. 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 for another 34 days and (2) instructing the parties to file a joint status report on March 4, 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: January 30, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that, on January 30, 2026, 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.

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