

THE HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WASHINGTON STATE MEDICAL  
ASSOCIATION; WASHINGTON STATE  
NURSES ASSOCIATION; WASHINGTON  
CHAPTER OF THE AMERICAN ACADEMY  
OF PEDIATRICS; ACADEMYHEALTH;  
ASSOCIATION OF NURSES IN AIDS CARE;  
FAST-TRACK CITIES INSTITUTE;  
INTERNATIONAL ASSOCIATION OF  
PROVIDERS OF AIDS CARE; NATIONAL  
LGBT CANCER NETWORK; VERMONT  
MEDICAL SOCIETY,

*Plaintiffs,*

v.

ROBERT F. KENNEDY, JR., in his official  
capacity as Secretary of Health and Human  
Services; DEPARTMENT OF HEALTH AND  
HUMAN SERVICES; SUSAN MONAREZ, in  
her official capacity as Director of the Centers for  
Disease Control and Prevention; CENTERS FOR  
DISEASE CONTROL AND PREVENTION;  
JAY BHATTACHARYA, in his official capacity  
as Director of the National Institutes of Health;  
NATIONAL INSTITUTES OF HEALTH;  
MARTIN A. MAKARY, in his official capacity  
as Commissioner of Food and Drugs; FOOD  
AND DRUG ADMINISTRATION; THOMAS J.  
ENGELS, in his official capacity as  
Administrator of the Health Resources and  
Services Administration; HEALTH

Case No. 2:25-cv-00955-LK

**STIPULATED MOTION AND  
[PROPOSED] ORDER TO STAY  
PROCEEDINGS**

NOTE ON MOTION CALENDAR:  
AUGUST 15, 2025

STIPULATED MOTION AND [PROPOSED]  
ORDER TO STAY PROCEEDINGS  
(No. 2:25-cv-00955-LK)

**Perkins Coie LLP**  
1301 Second Avenue, Suite 4200  
Seattle, Washington 98101  
Phone: +1.206.359.8000  
Fax: +1.206.359.9000

1 RESOURCES AND SERVICES  
2 ADMINISTRATION; CHARLES EZELL, in his  
3 official capacity as Acting Director of the Office  
4 of Personnel Management; OFFICE OF  
5 PERSONNEL MANAGEMENT,  
*Defendants.*

6 Pursuant to Local Rules W.D. Wash. LCR 7(b)(1) and LCR 10(g), Plaintiffs and  
7 Defendants respectfully move the Court to stay all proceedings in this matter—including the  
8 deadlines associated with cross-dispositive motions, *see* Dkt. 13—for a period of 45 days. The  
9 parties have reached an agreement in principle to resolve this matter, and a stay will allow the  
10 settlement to be finalized and implemented.

11 Once effectuated, the parties will notify the Court of the settlement pursuant to section IV  
12 of its standing order and the scheduling order of July 14, 2025. *See id.* at 2–3. Otherwise, the  
13 parties will file a joint status report with revised deadlines (i.e., 45-day extensions) for their cross-  
14 dispositive motions.

15 \* \* \*

16 The undersigned certify that this stipulated motion contains 116 words, in compliance with  
17 the Local Civil Rules.

1 Dated: August 15, 2025

By: s/ Kevin J. Hamilton

Kevin J. Hamilton, WSBA No. 15648  
Heath L. Hyatt, WSBA No. 54141  
Jonathan P. Hawley, WSBA No. 56297  
Raul P. Quintana, WSBA No. 62859  
**PERKINS COIE LLP**  
1301 Second Avenue, Suite 4200  
Seattle, Washington 98101  
Telephone: (206) 359-8000  
Facsimile: (206) 359-9000  
KHamilton@perkinscoie.com  
HHyatt@perkinscoie.com  
JHawley@perkinscoie.com  
RQuintana@perkinscoie.com

Mikael I. Floyd\*  
**PERKINS COIE LLP**  
700 Thirteenth Street NW, Suite 800  
Washington, D.C. 20005  
Telephone: (202) 654-6200  
Facsimile: (202) 654-6211  
MFloyd@perkinscoie.com

*Counsel for Plaintiffs*

*\*Admitted pro hac vice*

/s/ James W. Harlow  
JAMES W. HARLOW  
Acting Assistant Director  
Consumer Protection Branch  
U.S. Department of Justice  
P.O. Box 386  
Washington, DC 20044-0386  
(202) 514-6786  
(202) 514-8742 (fax)  
James.W.Harlow@usdoj.gov

*Counsel for Defendants*

**[PROPOSED] ORDER**

IT IS SO ORDERED.

Dated this \_\_\_\_ day of August, 2025.

\_\_\_\_\_  
United States District Judge

Presented by:

s/ Kevin J. Hamilton

Kevin J. Hamilton, WSBA No. 15648

Heath L. Hyatt, WSBA No. 54141

Jonathan P. Hawley, WSBA No. 56297

Raul P. Quintana, WSBA No. 62859

**PERKINS COIE LLP**

1301 Second Avenue, Suite 4200

Seattle, Washington 98101

Telephone: (206) 359-8000

Facsimile: (206) 359-9000

KHamilton@perkinscoie.com

HHyatt@perkinscoie.com

JHawley@perkinscoie.com

RQuintana@perkinscoie.com

Mikael I. Floyd\*

**PERKINS COIE LLP**

700 Thirteenth Street NW, Suite 800

Washington, D.C. 20005

Telephone: (202) 654-6200

Facsimile: (202) 654-6211

MFloyd@perkinscoie.com

*Counsel for Plaintiffs*

*\*Admitted pro hac vice*

/s/ James W. Harlow

JAMES W. HARLOW

Acting Assistant Director

Consumer Protection Branch

U.S. Department of Justice

P.O. Box 386

Washington, DC 20044-0386

(202) 514-6786

(202) 514-8742 (fax)

James.W.Harlow@usdoj.gov

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that, on August 15, 2025, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Dated: August 15, 2025

s/ Kevin J. Hamilton

Kevin J. Hamilton