

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

SOCIETY OF GENERAL INTERNAL
MEDICINE, ET AL.,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., ET AL.,

Defendants.

Case No.: 8:25-cv-02751-BAH

**UNOPPOSED MOTION TO STAY PROCEEDINGS
IN LIGHT OF LAPSE OF APPROPRIATIONS**

Defendants, through undersigned counsel, hereby move for a stay of the proceedings in the above-captioned case.

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 federal Defendants. The Department does not know when funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys and employees of the federal Defendants 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.

3. Undersigned counsel for the Department of Justice therefore requests a stay of all proceedings in this case until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will promptly notify the Court when Congress has appropriated funds for the Department. The Government requests that

all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations.

5. Undersigned counsel has conferred with counsel for Plaintiffs, who do not oppose this motion to stay.

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

A proposed order is attached.

Dated: October 4, 2025

Respectfully submitted,

Kelly O. Hayes
United States Attorney

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Counsel for Defendants

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ORDER

Upon consideration of Defendants’ unopposed Motion to Stay Proceedings in Light of Lapse of Appropriations (the “Motion”), it is, this ____ day of October 2025, by the United States District Court for the District of Maryland hereby:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the above-captioned action is STAYED until Congress has restored appropriations to the Department of Justice; and it is further

ORDERED that Defendants shall notify the Court as soon as possible once Congress has restored appropriations to the Department of Justice; and it is further

ORDERED that all deadlines in effect as of October 1, 2025 are extended by the number of days commensurate with the lapse in appropriations to the Department of Justice.

Brendan A. Hurson
United States District Judge