

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT**

LORI CHAVEZ-DEREMER,  
SECRETARY OF LABOR, U.S.  
DEPARTMENT OF LABOR,

Plaintiff-Appellee,

v.

SUFFOLK ADMINISTRATIVE  
SERVICES, LLC; PROVIDENCE  
INSURANCE CO., I.I.; ALEXANDER  
RENFRO; WILLIAM BRYAN;  
ARJAN ZIEGER,

Defendants,

DATA MARKETING  
PARTNERSHIP, LP; LP  
MANAGEMENT SERVICES, LLC,

Interested Parties-Appellants.

Case No. 25-1886

**MOTION TO STAY PROCEEDINGS DUE TO LAPSE IN  
APPROPRIATIONS**

The Department of Labor hereby requests that the Court stay proceedings in this matter, including extending any applicable deadlines. As grounds for this motion, the Department of Labor states as follows:

1. This matter is currently pending before the Court and the Department of Labor is a party to it. The undersigned represents the Department of Labor in this matter and is responsible for all filings and other actions.

2. On October 27, 2025, Data Marketing Partnership, LP (“DMP”) and LP Management Services, LLC (“LPMS”) filed Interested Parties-Appellants’ Motion to Abate Briefing Schedule Pending Mediation in this matter. The Secretary’s response to this motion is due ten days later. Fed. R. App. P. 27(a)(3)(A).

3. On October 30, 2025, DMP and LPMS filed a Motion to Stay Proceedings in the District Court of Puerto Rico Pending Appeal in this matter. The Secretary’s response to this motion is due ten days later. Fed. R. App. P. 27(a)(3)(A).

4. Per the briefing schedule set by this Court on October 6, 2025, DMP and LPMS’s brief in this appeal is due November 17, 2025, and the Secretary’s brief is due 30 days following service of DMP and LPMS’s brief.

5. At the end of the day on September 30, 2025, appropriated funding for the Department of Labor and its subagencies lapsed. At this time, we do not know when Congress will restore funding.

6. As a result of the lapse in appropriations, Department of Labor attorneys in the Solicitor’s Office (including the undersigned) are prohibited from doing work, even on a voluntary basis, “exceeding that authorized by law except for emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342. This exception “does not include ongoing, regular functions of government the suspension of which would not imminently threaten the safety of

human life or the protection of property.” *Id.*

7. In light of the foregoing, the Department of Labor requests that the Court extend all deadlines in this matter, including any proceeding dates, until at least 30 days after Congress has restored appropriations to the Department of Labor.

WHEREFORE, the Department of Labor respectfully requests that the Court stay all proceedings in this case, including extending any applicable deadlines.

Dated: November 4, 2025

Respectfully Submitted:

JONATHAN BERRY  
Solicitor of Labor

WAYNE R. BERRY  
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Plan Benefits Security

/s/ Blair L. Byrum  
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DeRemer, Secretary of Labor

## CERTIFICATE OF COMPLIANCE

1. This document complies with the type-volume limit of Fed. R. App. P. 27(d)(2) because, excluding the parts of the document exempted by the Fed. R. App. P. 32(f), this document contains 372 words.

2. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared using Microsoft 365 Word in proportionally spaced 14-point Times New Roman typeface.

/s/ Blair L. Byrum  
BLAIR L. BYRUM