

**UNITED STATES COURT OF APPEALS
For the First Circuit**

No. 25-1886

LORI CHAVEZ-DEREME, Secretary of Labor, US Department of Labor,
Plaintiff-Appellee,

v.

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

Defendants,

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

Interested Parties – Appellants

**INTERESTED PARTIES-APPELLANTS' RESPONSE TO DEPARTMENT
OF LABOR'S MOTION TO STAY PROCEEDINGS DUE TO A LAPSE IN
APPROPRIATIONS**

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Appellants, Data Marketing
Partnership LP and LP Management
Services LLC*

We represent Interested Parties-Appellants Data Marketing Partnership, LP (“DMP”) and LP Management Services, LLC (“LPMS”) in this matter (collectively, “Appellants”). Pending are two motions filed by Appellants: (1) Interested Parties-Appellants’ Motion to Abate Briefing Schedule Pending Mediation; and (2) Motion to Stay Proceedings in the District Court of Puerto Rico Pending Appeal.

On November 4, 2025, the Department of Labor (“DOL”) filed a motion to stay proceedings due to a lapse in appropriations during the government shutdown. Appellants do not oppose the DOL’s motion and consent to pursuing their pending motions after Congress has restored appropriations to the DOL. Appellants suggest that the DOL be required to notify the Court when Congress has restored appropriations to the DOL and that appropriate deadlines be set such that the Appellants’ pending motions can be responded to and heard before a new briefing schedule is set.

Respectfully submitted,

/s/ Alberto J. Bayouth-Montes
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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing response complies with the word limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because the motion contains 143 words. The response complies with the typeface and type-style requirements of Federal Rules of Appellate Procedure 27(d)(1)(E) and 32(a)(5) and (6) because it has been prepared using Microsoft Word for Office 365 in proportionally spaced 14-point Times New Roman typeface.

/s/ Lisa Carney Eldridge
Lisa Carney Eldridge

CERTIFICATE OF SERVICE

I, Lisa Carney Eldridge, hereby certify that on November 6, 2025, I caused this document to be electronically filed with the Clerk of the Court for the United States Court of Appeals for the First Circuit using the Court's appellate CM/ECF system. Plaintiff/Appellee's counsel is a registered CM/ECF user and will be served via the Notice of Docket Activity through the Court's CM/ECF system.

/s/ Lisa Carney Eldridge
Lisa Carney Eldridge