

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

American Federation of State, County, and
Municipal Employees, AFL-CIO, *et al.*,

Plaintiffs,

v.

Russell Vought, in his official capacity as
Director of the Office of Management and
Budget, *et al.*,

Defendants.

No. 26-2656
Judge John F. Kness

**SEPARATE STATEMENT REGARDING BRIEFING
OF DEFENDANTS' MOTION TO TRANSFER**

Pursuant to the Court's motions policy, Defendants respectfully report that the parties have conferred regarding Defendants' opposed Motion to Transfer, ECF No. 16, and have agreed on the following briefing schedule:

- Plaintiffs' opposition: due by May 8, 2026
- Defendants' reply: due by May 22, 2026

The parties also conferred regarding Plaintiffs' opposed Motion for Preliminary Injunction and Stay Under 5 U.S.C. § 705, ECF No. 17, which was the subject of prior separate statements, ECF Nos. 20, 21, but did not reach agreement. Plaintiffs believe that their preliminary injunction motion should be briefed contemporaneously with the transfer motion, with Defendants' opposition due by May 8, 2026, and Plaintiffs' reply due by May 22, 2026. Plaintiffs respectfully inform the Court that they may seek expedition of the briefing schedule for their preliminary injunction motion if further proceedings in *Illinois v. Vought*, 26-cv-01566, so warrant. Defendants maintain that

briefing Plaintiffs' preliminary injunction motion is unwarranted, for the reasons set out in detail in their prior separate statement, ECF No. 21, to which they respectfully refer the Court. If the Court concludes otherwise, however, Defendants are amenable to Plaintiffs' proposal.

Dated: April 2, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

ERIC HAMILTON
Deputy Assistant Attorney General

ERIC B. BECKENHAUER
Assistant Director

/s/ Pardis Gheibi

PARDIS GHEIBI (D.C. Bar No.
90004767)
Trial Attorney, U.S. Department of
Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Tel.: (202) 305-3246
Email: pardis.gheibi@usdoj.gov

Attorneys for Federal Defendants