

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST
DOMESTIC VIOLENCE, *et al.*

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official
capacity as Secretary of the United States
Department of Health and Human Services, *et al.*

Defendants.

Case No. 25-cv-342

MOTION FOR STAY
IN LIGHT OF LAPSE IN APPROPRIATIONS

Defendants respectfully move this Court for a stay of this action in light of the current lapse in appropriations by Congress. As the Court is likely aware, on October 1, 2025, appropriations funding significant portions of the federal government, including the Department of Justice (“DOJ”), the United States Attorneys’ Offices (“USAO”), the U.S. Department of Health & Human Services (“HHS”), and the U.S. Department of Housing & Urban Development (“HUD”), expired. As of this writing, no further appropriation by Congress has been made.

Absent a further Congressional appropriation, the United States is required to impose significant restrictions on the ability of many of its employees to carry out their ordinary duties. Specifically, certain DOJ attorneys, agency attorneys, and other employees of the federal government 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. The lapse in appropriations thus requires a substantial reduction in

the workforces of the USAO, HUD, and HHS, particularly with respect to the defense of civil cases. This reduction has effectively eliminated the ability of counsel who have worked on and are familiar with this case to handle the litigation and to file the Defendants' motion papers while the lapse in appropriations continues.

Under the circumstances, Defendants respectfully request that the Court: (1) stay this action until the restoration of funding to DOJ and the Defendants; and (2) toll all pending and potential deadlines, including any deadlines for compliance with the terms of any revised TRO or similar order the Court may enter.

We regret the necessity of this request and thank the Court for its time and consideration.

Dated: October 1, 2025

Respectfully submitted,

U.S. DEPARTMENT OF HOUSING &
URBAN DEVELOPMENT, et al.

By their Attorneys,

SARA MIRON BLOOM
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/s/ Lauren S. Zurier

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CERTIFICATION OF SERVICE

I hereby certify that on October 1, 2025, I electronically filed the foregoing document and the accompanying exhibits through this Court's Electronic Case Filing (ECF) system, which will serve it upon all registered users in accordance with Federal Rule of Civil Procedure 5(b)(2)(E).

/s/ Lauren S. Zurier

Lauren S. Zurier
Assistant United States Attorney