

**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

**RENEWED MOTION FOR STAY  
IN LIGHT OF LAPSE IN APPROPRIATIONS**

Defendants respectfully again move this Court for a stay of further proceedings in this action in light of the current lapse in appropriations by Congress. Defendants rely on, and incorporate by reference, the grounds set forth in their initial motion for stay (ECF No. 68).

Defendants additionally ask the Court to consider the following:

1. The Court has provided Plaintiffs with preliminary relief and Defendants have complied with the Court's order. *See* ECF Nos. 77-80. Granting the Defendants a temporary stay will not disturb the status quo.
2. Undersigned counsel notes that Defendants' answer to the amended complaint is currently due by November 14, 2025. Absent the granting of a stay, Defendants must move forward with this litigation at a time when undersigned counsel is being furloughed at least twice per week. Counsel has also learned that her key point of contact at HUD is away on his honeymoon from November 6-21.

3. Defendants asked Plaintiffs' counsel last week whether they would assent to this motion but did not receive a response to that particular question. Plaintiffs' counsel separately indicated that they did not see a need for the Court to enter a scheduling order during the shutdown.

Under the circumstances, Defendants respectfully request that the Court: (1) stay further proceedings in this action until the restoration of funding to the Department of Justice and the Defendants; and (2) toll all pending and potential deadlines, including any deadline for answering the amended complaint.

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

Dated: November 5, 2025

Respectfully submitted,

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

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/s/ Lauren S. Zurier  
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CERTIFICATION OF SERVICE

I hereby certify that on November 5, 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