

1 Second, once the lapse in appropriations has ended, the parties will attempt to resolve this issue
2 without further judicial involvement. If the lapse in appropriations does not end prior to
3 December 12, 2025, the parties will submit a further status update with the Court.

4 The parties propose the following response schedule to Petitioner’s motion for fees and
5 costs:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents’ Response to Fees Motion	December 12, 2025
Petitioner’s reply in support of the Fees Motion	December 17, 2025

10 Accordingly, the parties request that the Court enter the proposed briefing schedule.

11 DATED this 7th day of November, 2025.

12 Respectfully submitted,

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NATIONS LAW GROUP

19 *Attorneys for Federal Respondents*

20 *I certify that this memorandum contains 211*
21 *words, in compliance with the Local Civil*
22 *Rules.*

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[PROPOSED] ORDER

The parties having stipulated and agreed, it is hereby so ORDERED. The parties shall submit briefing pursuant to the following schedule:

<u>Filing</u>	<u>Deadline</u>
Federal Respondents' Response to Fees Motion	December 12, 2025
Petitioner's reply in support of the Fees Motion	December 17, 2025

If the lapse in appropriations to the Department of Justice does not end prior to December 12, 2025, the parties shall submit a status report with this Court.

DATED this ____ day of _____, 2025.

TIFFANY M. CARTWRIGHT
United States District Judge