

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PERKINS COIE LLP,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-00716 (BAH)

Judge Beryl A. Howell

JOINT STATUS REPORT

Pursuant to the Court’s March 12, 2025 Temporary Restraining Order and the Court’s March 13, 2025 Minute Order, the parties hereby submit the following Joint Status Report:

1. On March 12, 2025, the Court ordered *inter alia* that the “parties shall file, by 4:00 PM on March 13, 2025, a joint status report proposing a schedule to govern further proceedings in this case.” ECF No. 21 at 2. On March 13, 2025, by Minute Order, the Court extended that joint status report deadline to 3:00 PM on March 14, 2025 at the parties’ request.

2. The parties have met and conferred and jointly propose that this Court proceed to expedited dispositive motions briefing. Plaintiff intends to move for summary judgment. Defendants intend to move to dismiss.

3. The parties respectfully propose the following schedule to govern briefing on the parties’ dispositive motions:

Opening briefs	April 2, 2025 at 5:00 PM
Oppositions	April 16, 2025 at 5:00 PM
Motions hearing if necessary (in-person)	Week of April 21, Courtroom 26A

4. The parties have also agreed that they require no discovery and will request no discovery in opposition to any dispositive motion (including summary judgment), and respectfully request that this Court therefore stay discovery pending further order of the Court.

5. All parties have also agreed to extend the Temporary Restraining Order issued by this Court on March 12, 2025, ECF No. 21, until final judgment. *See* Fed. R. Civ. P. 65(b)(2).

6. Based on these agreements, the parties have attached a proposed order to govern further proceedings.

Dated: March 14, 2025

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

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**[PROPOSED] ORDER EXTENDING INJUNCTION
AND EXPEDITING DISPOSITIVE MOTION PROCEEDINGS**

Upon consideration of the parties' Joint Status Report dated March 14, 2025, it is hereby:

ORDERED that the injunction issued by this Court on March 12, 2025, ECF No. 21, shall be **EXTENDED** by agreement of all parties until final judgment.

IT IS FURTHER ORDERED that the parties shall file any and all dispositive motions (whether motion to dismiss or motion for summary judgment) according to the following schedule:

Opening briefs	April 2, 2025 at 5:00 PM
Oppositions	April 16, 2025 at 5:00 PM
Motions hearing if necessary (in-person)	Week of April 21, Courtroom 26A

IT IS FURTHER ORDERED that, in view of the parties' agreement that they require no discovery and will request no discovery in opposition to any dispositive motion contemplated above (including summary judgment), discovery shall be stayed in this case pending further order of the Court.

IT IS SO ORDERED.

Washington, D.C.

Dated: _____

BERYL A. HOWELL
United States District Judge