

Court, request an additional continuance and stay if good faith settlement negotiations continue, or propose a briefing schedule on fees.

4. Because of the lapse in appropriations, Defendants have been unable to engage in settlement negotiations with Plaintiffs. Accordingly, Defendants respectfully ask the Court to stay the deadlines in the November 30, 2018 Order, ECF No. 44, pending the lapse in appropriations. Plaintiffs consent to this request. The parties respectfully suggest that the new deadline for the parties to file a fee and cost agreement with the Court, request an additional continuance and stay if good faith settlement negotiations continue, or propose a briefing schedule should be thirty days after the lapse in appropriations ends.

Respectfully submitted this 16th day of January, 2019,

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2019, I filed through the United States District Court ECF System the foregoing Motion for Stay to be served by CM/ECF electronic filing on all counsel of record.

/s/ Rebecca Jaffe
Rebecca Jaffe
U.S. Department of Justice