

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN OVERSIGHT,

Plaintiff,

v.

U.S. CUSTOMS AND BORDER
PROTECTION,

Defendant.

Civil Action No. 26-750 (JDB)

**MOTION TO STAY PROCEEDINGS DUE TO
PARTIAL GOVERNMENT SHUTDOWN**

Defendant Customs and Border Protection (“CBP”) respectfully moves this Court to stay Defendant’s obligation to file its responsive pleading to the Complaint in this Freedom of Information Act (“FOIA”) case until thirty (30) days after the current partial government shutdown has ended. Pursuant to Local Civil Rule 7(m), undersigned counsel contacted Plaintiff by email regarding the requested relief. Plaintiff opposes this stay.

Good cause supports this motion. Presently, due to a current lapse in appropriations, necessary staff at CBP are furloughed that would be needed to file a responsive pleading, which is currently due on Monday, April 6, 2026. Defendant therefore respectfully requests that the Court stay further proceedings in this action, including the deadline related to filing a responsive pleading to the Complaint.

A proposed order is attached.

Dated: April 1, 2026

Respectfully submitted,

JEANINE FERRIS PIRRO
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/s/ Zachariah Lindsey
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[PROPOSED] ORDER

UPON CONSIDERATION of the Defendant's motion to stay proceedings due to partial government shutdown, and for good cause shown, it is hereby

ORDERED that Defendant's motion is GRANTED, and it is further

ORDERED that Defendant's responsive pleading will be due 30 days after resumption of normal federal government operations.

SO ORDERED:

Date

United States District Judge