

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DISTRICT OF COLUMBIA,

Plaintiff,

v.

DONALD J. TRUMP, et al.,

Defendants.

Civil Action No. 1:25-cv-03005-JMC

**DEFENDANTS' MOTION TO STAY
FURTHER DISTRICT COURT PROCEEDINGS**

Defendants Donald J. Trump, in his Official Capacity as President of the United States, the United States Department of Defense, Peter B. Hegseth, in his Official Capacity as Secretary of Defense, the United States Army, Daniel P. Driscoll, in his Official Capacity as Secretary of the Army, the United States Department of Justice, Pamela J. Bondi, in her Official Capacity as United States Attorney General, the United States Marshals Service, and Gadyaces S. Serralta, in his Official Capacity as Director of the United States Marshals Service (collectively, "Defendants") hereby move to stay all district court proceedings pending resolution of the appeal currently before the United States Court of Appeals for the District of Columbia Circuit. The grounds for this motion are set forth at length in the accompanying Combined Memorandum of Law in Support of Defendants' Motion to Stay Further District Court Proceedings and in Opposition to Plaintiff's Motion for Summary Judgment Briefing Schedule.

Pursuant to Local Civil Rule 7(m), counsel for Defendants conferred with counsel for Plaintiff regarding this motion. Plaintiff opposes the motion. A proposed order is attached.

Dated: January 16, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General

JOHN BAILEY
Counsel to the Assistant Attorney General

ALEXANDER K. HAAS
Branch Director

BRAD P. ROSENBERG
Special Counsel

/s/ Kian K. Azimpoor
KIAN KEVIN AZIMPOOR
U.S. Department of Justice
Trial Attorney
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005
Phone: 202-598-0860
Email: kian.k.azimpoor@usdoj.gov

Attorneys for Defendants