

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

CAMPAIGN LEGAL CENTER,	)	
	)	
	)	
Plaintiff,	)	
v.	)	Case No. 18-cv-1771 (TSC)
	)	
U.S. DEPARTMENT OF JUSTICE,	)	
	)	
	)	
Defendant.	)	
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**PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION TO STAY PROCEEDINGS**

The Department of Justice (“DOJ”) has filed a motion to stay proceedings due to the lapse in appropriations, preventing DOJ personnel from working except for under limited circumstances. While the Campaign Legal Center (“CLC”) recognizes the basis for granting a stay, the indefinite length of delay requested by DOJ is not appropriate in this case.

The subject matter of this case, the 2020 Census, will occur regardless of the length of the partial government shutdown. As this case concerns a time sensitive matter of significant public interest, any further delay should be of limited and specific duration. CLC respectfully requests that any stay last the shorter of the duration of the lapse in appropriations or one month.

Moreover, the length of DOJ’s requested extension of the deadline for filing the Joint Status Report is unnecessary because, based on its prior representations to the Court, its document search should already be complete.<sup>1</sup> The Joint Status Report now due January 5, 2019 was originally due on December 17, 2018. DOJ requested an extension until December 27, 2018 and CLC consented

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<sup>1</sup> If “all current deadlines for the parties [are] extended commensurate with the calendar day duration of the lapse,” as DOJ requests, the deadline for filing the Joint Status Report will be over two weeks after the stay expires.

on the condition that the extension lead to a proposed production schedule by December 28, 2018. At the time, DOJ indicated that it intended to meet that deadline, that its search for responsive documents was expected to be complete by December 21, 2018 (prior to the lapse in appropriations), and that it would be ready to proceed shortly after that date. Given the previous request for an extension, CLC's conditional consent, and DOJ's representation that it expected to complete the search for responsive documents prior to the lapse in funding, CLC respectfully requests that the deadline to file the Joint Status Report be set for one week following the end of the stay period.

Dated: January 7, 2019

Respectfully submitted,

/s/ Nadav Ariel  
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**CERTIFICATE OF SERVICE**

I certify that on this 7th day of January, 2019, I electronically filed the foregoing document with the Clerk of Court via ECF, which will send electronic notification of such filing to all counsel of record.

/s/ Nadav Ariel

Nadav Ariel

*Counsel for Plaintiff Campaign Legal  
Center*