

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)	
)	
Plaintiff,)	
)	
v.)	No. 22 C 5072
)	
UNITED STATES DEPARTMENT OF)	Judge Kennelly
HEALTH AND HUMAN SERVICES, <i>et al.</i> ,)	
)	
Defendants.)	

MOTION TO STAY CASE WITH RESPECT TO CBP

Defendants, by their attorney Andrew S. Boutros, United States Attorney for the Northern District of Illinois, moves to stay this case with respect to defendant U.S. Customs and Border Protection and in support state as follows:

1. In this Freedom of Information Act case, the court has set a summary judgment briefing schedule under which defendants HHS and CBP are to move for summary judgment by March 20, 2026. Dkt. 208. The court has also scheduled a bench trial for June 22, 2026. Dkt. 206.
2. The undersigned AUSA has been diligently preparing to move for summary judgment by the March 20 deadline. However, due to the current lapse in appropriations for the Department of Homeland Security, CBP itself is unable to work on FOIA matters. This prevents CBP from moving for summary judgment as scheduled: it has prevented CBP from finalizing and producing another FOIA response as it had planned to do by March 13, and it prevents CBP from preparing a declaration in support of summary judgment.
3. Good cause accordingly exists to stay all deadlines with respect to CBP and to set new deadlines once the lapse in appropriations ends.

4. The stay need only apply to CBP. HHS can and will move for summary judgment as planned by March 20.

5. Plaintiff opposes this motion.

WHEREFORE, defendants request that the court stay all deadlines with respect to CBP.

Respectfully submitted,

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