

4. Opposing counsel advises that plaintiff will take no position on the Government's motion for stay.

5. Therefore, although we greatly regret any disruption caused to the Court and plaintiff, the Government hereby moves for a stay of all proceedings in this case until appropriations to DOJ, DHS, CBP, and ICE have been restored.

Respectfully submitted,

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Assistant Attorney General

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s/ David M. Glass

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Dated: January 21, 2019

CERTIFICATE OF SERVICE

I certify that I served the within motion and proposed order on all counsel of record by filing them with the Court by means of its ECF system on January 21, 2019.

s/ David M. Glass

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

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KNIGHT FIRST AMENDMENT INSTITUTE)	
AT COLUMBIA UNIVERSITY,)	
)	
	Plaintiff,)	
)	
	v.)	No. 1:17-cv-00548-TSC
)	
DEPARTMENT OF HOMELAND)	
SECURITY, <i>et al.</i>,)	
)	
	Defendants.)	
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[PROPOSED] ORDER

It is hereby ordered as followed in view of defendants’ motion for stay in light of lapse of appropriations and good cause having been shown:

1. Defendants’ motion is granted.
2. All proceedings in this case are stayed until Congress restores appropriations to the Department of Justice, Department of Homeland Security, U.S. Customs and Border Protection, and U.S. Immigration and Customs Enforcement.
3. All current deadlines in this case are extended commensurate with the duration of the lapse in appropriations.

Dated: _____

UNITED STATES DISTRICT JUDGE