

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

JANE DOE #1 et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY et al.,

Defendants.

Civil Action No.: 1:17-cv-02005

JOINT MOTION TO STAY PROCEEDINGS

The parties in the above-captioned case respectfully move this Court to enter an order staying all proceedings in this case for 90 days.

Recent communications between the parties suggest that Plaintiffs' claims may be resolved without further litigation. As a result, the parties believe that a stay is appropriate to give the parties a reasonable amount of time to attempt to resolve this matter. During the proposed stay, Plaintiffs agree to take all necessary steps to obtain their visas, and Defendants agree to process Plaintiffs' visa requests in an expedited manner. Furthermore, the parties propose that they file joint status reports with the Court during the pendency of the stay to update the Court on developments in this matter, with an initial report due 60 days after entry of an order staying these proceedings, and a subsequent report due 30 days thereafter.

“District Court[s] ha[ve] broad discretion to stay proceedings.” *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *see also Friends of Animals v. Pruitt*, No. 16-1503 (D.D.C. Oct. 18, 2016) (order granting stay of proceedings to allow parties to explore settlement). In light of the potential for the parties to resolve this matter without further Court involvement, exercise of the Court’s broad discretion to grant a stay of this matter would be efficient for both the parties and the Court.

For the reasons set forth above, the parties respectfully request that the Court grant the relief sought in this motion. A proposed order is attached.

Respectfully submitted,

JESSIE K. LIU,
DC Bar # 472845
United States Attorney
for the District of Columbia

DANIEL F. VAN HORN
DC Bar # 924092
Civil Chief

/s/ KENNETH ADEBONOJO
KENNETH ADEBONOJO
Assistant United States Attorney
Judiciary Center Building
555 4th Street, N.W.
Civil Division
Washington, D.C. 20530

/s/ Mark H. Lynch
Mark H. Lynch
DC Bar # 193110
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001
Telephone: 202-662-5544
Fax: 202-778-5544
mlynch@cov.com

Johnathan Smith
DC Bar # 1029373
Sirine Shebaya
DC Bar # 1019748
MUSLIM ADVOCATES

(202) 252-2562

Attorney for Defendants

P.O. Box 66408

Washington, D.C. 20035

Phone: 202.897.1894

Attorneys for Plaintiffs

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