

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

SUSMAN GODFREY LLP,

Plaintiff-Appellee,

v.

EXECUTIVE OFFICE OF THE
PRESIDENT,
et al.,

Defendants-Appellants.

Civil Action No. 25-5310

DEFENDANTS-APPELLANTS' MOTION FOR EXTENSION OF TIME

Defendants-Appellants respectfully move for a 45-day extension of time to respond to the Court's order dated October 8, 2025, directing the parties to file motions to govern further proceedings within 30 days of the date that appropriations are restored. Per Circuit Rule 27(g), Defendants-Appellants have conferred with opposing counsel and represent that Plaintiff-Appellee takes no position on this motion.

On September 23, 2025, this Court entered an order in the following cases: *Perkins Coie LLP v. U.S. Dep't of Justice*, No. 25-5241; *Jenner & Block LLP v. U.S. Dep't of Justice*, No. 25-5265; *Wilmer Cutler Pickering Hale & Door LLP v. Exec. Off. of the Pres.*, No. 25-5277; *Susman Godfrey LLP v. Exec. Off. of the*

Pres., No. 25-5310. The Court directed the parties to file motions to govern further proceedings in these cases within 30 days of the date of the order.

On October 6, 2025, Defendants-Appellants moved for a stay of the Court's order in light of the lapse in appropriations.

On October 8, 2025, this Court ordered that the motions be granted and that these cases be held in abeyance pending further order of the Court. The Court further directed the parties to comply with the Court's order filed September 23, 2025, within 30 days of the date that appropriations are restored and the Department of Justice attorneys are permitted to resume their usual civil litigation functions.

The undersigned counsel and his wife recently welcomed their third child, and is currently on paternity leave through January 5, 2026. Defendants-Appellants therefore respectfully move this Court to provide a 45-day extension of time to respond to the Court's order dated October 8, 2025, directing the parties to file motions to govern further proceedings within 30 days of the date that appropriations are restored.

Dated: December 8, 2025
Washington, D.C.

Respectfully submitted,

STANLEY E. WOODWARD, JR.
Associate Attorney General

/s/ Abhisek Kambli
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Counsel for Defendants-Appellants

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2025, I electronically filed the foregoing motion with the Clerk of the Court for the United States Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system.

/s/ Abhisek Kambli

ABHISHEK KAMBLI