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12
 13 **IN THE UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 U.S. WECHAT USERS ALLIANCE, *et al.*,
 16
 17 Plaintiffs,

Case No. 3:20-cv-05910-LB

18 v.

**DEFENDANTS' MOTION
 TO SHORTEN TIME**

19 DONALD J. TRUMP, President of the United
 States, and WILBUR ROSS, Secretary of
 20 Commerce,

21 Defendants.

22 Pursuant to Civil Local Rule 6-3, Defendants Donald J. Trump, President of the United States,
 23 and Wilbur Ross, in his official capacity as Secretary of Commerce (the "Secretary"), respectfully
 24 request that the Court shorten the time for briefing on their motion to stay the Court's preliminary
 25 injunction pending any appeal. In support of that request, Defendants respectfully state as follows:
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1 1. The Court issued its order granting Plaintiffs’ motion for a preliminary injunction on
2 Saturday, September 19, 2020, ECF No. 59 (“Order”), after expedited briefing on the prior day, Friday
3 September 18, 2020. The Order enjoins the Secretary’s implementation of Executive Order 13,943, as
4 set forth in the Secretary’s Identification of Prohibition Transactions, issued September 18, 2020
5 (limited to the Identification of Prohibited Transactions 1 through 6). *See* Order at 22.

6 2. Defendants have moved to stay the preliminary injunction pending any appeal to the U.S.
7 Court of Appeals for the Ninth Circuit and, if necessary, the Supreme Court. Pursuant to Local Civil
8 Rule 7-2, such a motion would not be submitted for the Court’s consideration for at least 35 days.

9 3. In light of the nationwide preliminary relief entered by the Court, in conjunction with the
10 national security and foreign policy concerns raised by Defendants, Defendants respectfully request that
11 the Court shorten the time for consideration of their motion, such that the Court will issue its ruling on
12 the motion to stay on or before October 1, 2020.

13 4. Undersigned counsel for Defendants conferred by phone and email with Michael Bien of
14 Rosen Bien Galven & Grunfeld, one of the counsel for Plaintiffs in this action. Mr. Bien indicated that
15 Plaintiffs oppose Defendants’ requested schedule because they are short-staffed with certain team
16 members on vacation and others working on other expedited matters, and because Monday is Yom
17 Kippur, but would respond to the motion in seven days. Defendants respectfully respond that although
18 their team, too, is juggling multiple expedited matters, they nevertheless responded to Plaintiffs’
19 renewed motion for a preliminary injunction during the weekend of Rosh Hashanah, and that the
20 national security interests implicated by this case warrant expeditious resolution. Defendants thus
21 respectfully request that the Court shorten time as requested herein.

22 5. Granting the relief requested herein would not affect the other deadlines in this case. The
23 Court has previously modified the deadlines related to Plaintiffs’ motion for a preliminary injunction,
24 ECF No. 17, and Plaintiffs’ renewed motion for a preliminary injunction, ECF No. 48.

25 Dated: September 24, 2020

Respectfully submitted,

26 JEFFREY BOSSERT CLARK
Acting Assistant Attorney General

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