

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
ANDREW G. MCCABE,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	Civil Action No. 19-2399 (RDM)
MERRICK B. GARLAND,)	
in his official capacity as)	
ATTORNEY GENERAL OF THE)	
UNITED STATES, <i>et al.,</i>)	
)	
<i>Defendants.</i>)	
_____)	

**JOINT MOTION FOR A LIMITED STAY OF DISCOVERY AND
45-DAY EXTENSION OF CASE DEADLINES AND EVENTS**

The parties jointly move this Court to stay all discovery in this proceeding, for 45 days after this motion is granted, and to extend all previously set case deadlines and events by 45 days. The parties request this relief so that they may explore the possibility of settlement.

Good cause exists for the requested relief, because the stay and extension would allow the parties to focus their efforts on discussing settlement expeditiously, free from any competing obligations and ongoing disputes related to discovery, and without burdening the Court with potentially unnecessary discovery disputes. The parties propose to update the Court two business days before the stay’s expiration about whether a further stay and extension is warranted.

April 23, 2021

/s/ Murad Hussain
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Respectfully submitted,

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