

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CITIZENS FOR RESPONSIBILITY AND  
ETHICS IN WASHINGTON,  
Plaintiff,

v.

U.S. DOGE SERVICE, *et al.*,  
Defendants.

Case No. 1:25-cv-00511

**DEFENDANTS' MOTION FOR PARTIAL RECONSIDERATION OF  
THIS COURT'S MARCH 10, 2025 OPINION AND ORDER, FOR AN ORDER  
SETTING AN EXPEDITED BRIEFING SCHEDULE, AND FOR A STAY OR  
EXTENSION OF THIS COURT'S MARCH 10, 2025 OPINION AND ORDER**

The United States DOGE Service (USDS) respectfully moves this Court for reconsideration of the portions of this Court's March 10, 2025 opinion and order directing USDS to process the Freedom of Information Act Request addressed to USDS, directing USDS to provide an estimate of the volume of records responsive to that request by March 20, 2025, and further directing USDS to propose a schedule for expedited processing and rolling production of responsive records by March 27, 2025. USDS further requests that this Court order expedited briefing on USDS's forthcoming motion for summary judgment, and set the following briefing schedule:

USDS shall file its motion on or before March 19, 2025.

Plaintiff Citizens for Responsibility and Ethics in Washington (CREW) shall file its opposition to USDS's motion on or before March 24, 2025.

USDS may file a reply in support of its motion on or before March 26, 2025.

USDS further requests that the Court enter a stay or extend the dates described above until the Court rules on this reconsideration motion and USDS's forthcoming summary judgment motion.

Undersigned counsel conferred with counsel for CREW. CREW opposes the relief requested in this motion.

In support of this Motion, USDS refers the Court to the accompanying Memorandum in Support. Proposed orders reflecting the requested relief are attached.

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director, Federal Programs Branch

/s/ Andrew M. Bernie  
Andrew M. Bernie  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, D.C. 20005  
(202) 353-7203  
andrew.m.bernie@usdoj.gov

*Attorneys for Defendant*