

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

LIYANARA SANCHEZ, as next friend on behalf
of FRENDEL REYES MOTA, *et al.*,

Petitioners–Plaintiffs,

J.G.G., *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No: 1:25-cv-00766-JEB

**MOTION FOR STAY PENDING RESOLUTION OF DEFENDANTS’
RECONSIDERATION MOTION AND PETITION FOR WRIT OF MANDAMUS**

This Court has compelled testimony, to begin on Monday morning of next week, in support of its ongoing inquiry into potential criminal contempt. ECF 200. Defendants have moved for reconsideration of that order, or in the alternative for a protective order. ECF 201. Late last night, Plaintiffs filed a lengthy opposition that raises a host of new arguments, including sweeping claims about the waiver or vitiation of the attorney-client privilege. ECF 205. In light of the time exigency, Defendants have also filed a petition for writ of mandamus with the Court of Appeals. Defendants now respectfully ask the Court to stay next week’s proceedings pending its resolution of the reconsideration motion, and pending the D.C. Circuit’s resolution of the mandamus petition. Given that this contempt inquiry is a purely retrospective evaluation of events that occurred nine months ago, there is no reason why testimony needs to be compelled next week and before these serious issues are considered and adjudicated by this Court and the Court of Appeals.

Dated: December 12, 2025

Respectfully submitted,

Brett A. Shumate
Assistant Attorney General

/s/ Tiberius Davis

Tiberius Davis
Counsel to the Assistant Attorney General
Civil Division
U.S. Department of Justice
(202)-514-4357

Anthony Nicastro
Acting Director
Office of Immigration Litigation

Counsel for Respondents–Defendants