

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FREEDOM OF THE PRESS
FOUNDATION, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, et al.,

Defendants.

Civil Action No. 25-3387 (CJN)

CONSENT MOTION TO STAY OBLIGATION TO ANSWER

Defendants Department of Homeland Security and Centers for Medicare & Medicaid Services (“Defendants”) hereby respectfully request, through undersigned counsel, a stay of their obligation to file their answer or otherwise respond to the complaint (ECF No. 1). The deadline is currently January 15, 2026. Pursuant to Local Rule 7(m), counsel for Defendants has met and conferred with counsel for Plaintiffs and understands that Plaintiffs consent.

1. On September 24, 2025, Plaintiffs filed their complaint pursuant to the Freedom of Information Act (“FOIA”). ECF No. 1.

2. On December 15, 2025, the Court granted Defendants’ motion for extension of time and ordered that Defendants shall file their answer or otherwise respond to Plaintiffs’ Complaint on or before January 15, 2026. Min. Order (Dec. 15, 2025).

3. Plaintiffs have been provided a copy of the public record at issue in this case and have since conveyed a proposal to resolve this matter and their claim for attorney’s fees and costs. Defendants are currently reviewing Plaintiffs’ demand. Defendants respectfully submit that the interest of conserving government resources would be best served by staying Defendants’

obligation to file a responsive pleading while the parties attempt to negotiate resolution of this matter.

4. In light of the foregoing, Defendants respectfully request that the Court grant their motion and stay their obligation to file a responsive pleading while the parties attempt to negotiate resolution of this matter without the need for additional litigation, and order the parties to file a joint status report every sixty days to update the Court on the status of their efforts to resolve this matter.

A proposed Order is being filed with this motion.

Dated: January 13, 2026
Washington, DC

Respectfully submitted,

JEANINE FERRIS PIRRO
United States Attorney

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