IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

NATIONAL ASSOCIATION OF GOVERNMENT EMPLOYEES, INC.,))
Plaintiff,))
v.)
JANET YELLEN, Secretary of Treasury,)
in her official capacity, and)
JOSEPH BIDEN, President of the United)
States, in his official capacity)
)
Defendants.)

Civil Action No.: 1:23-cv-11001-RGS

JOINT MOTION TO SET SCHEDULING CONFERENCE

Pursuant to Rule 16 of the Federal Rules of Civil Procedure and Rule 16.1 of the Local Rules of this Court, Plaintiff National Association of Government Employees, Inc., and Defendants Janet Yellen, in her official capacity as Secretary of Treasury, and Joseph Biden, in his official capacity as President of the United States, by and through their respective counsel of record, hereby jointly state as follows:

- 1. WHEREAS, Plaintiff has filed an Emergency Motion for Preliminary Injunction in the instant matter (Dkt. No. 7);
- WHEREAS, Defendants intend to file an opposition to Plaintiff's Emergency Motion for Preliminary Injunction;
- WHEREAS, the Parties disagree regarding the timeline for completing briefing on Plaintiff's Emergency Motion for Preliminary Injunction and have jointly agreed to request an initial status conference in this matter to discuss a briefing schedule;

Case 1:23-cv-11001-RGS Document 15 Filed 05/22/23 Page 2 of 3

THEREFORE, the Parties respectfully request that the Court hold an initial scheduling

conference via Zoom videoconference technology on May 23, 2023 at 11:00 AM to discuss a

briefing schedule and hearing date for Plaintiff's Emergency Motion for Preliminary Injunction.

Dated: May 22, 2023

Respectfully submitted,

NATIONAL ASSOCIATION OF GOVERNMENT EMPLOYEES, INC.,

By its attorneys,

<u>/s/ Shannon Liss-Riordan</u> Shannon Liss-Riordan, BBO #640716 Matthew P. Carrieri BBO #705192 Lichten & Liss-Riordan, P.C. 729 Boylston Street, Suite 2000 Boston, MA 02116 (617) 994-5800 sliss@llrlaw.com mcarrieri@llrlaw.com

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Dated: May 22, 2023

JANET YELLEN, Secretary of Treasury, in her official capacity, and **JOSEPH BIDEN**, President of the United States, in his official capacity,

By their attorneys,

BRIAN M. BOYNTON Principal Deputy Assistant Attorney General

ALEXANDER K. HAAS Branch Director

BRAD P. ROSENBERG Special Counsel

DIANE KELLEHER Assistant Branch Director

<u>/s/Alexander N. Ely</u> Alexander N. Ely (DC Bar No. 230008) Federal Programs Branch Civil Division, U.S. Department of Justice 1100 L Street, NW Washington, DC 20005 (202) 993-5177 Alexander.n.ely@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2023, a true and accurate copy of the above document

was filed with the Court via CM/ECF system, which will send e-mail notification of such filing

to all attorneys of record.

<u>/s/ Shannon Liss-Riordan</u> Shannon Liss-Riordan