

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

IN RE FOUR APPLICATIONS FOR SEARCH  
WARRANTS SEEKING INFORMATION  
ASSOCIATED WITH PARTICULAR  
CELLULAR TOWERS  
A/K/A TOWER-DUMP WARRANTS

CRIMINAL NO. 3:25-CR-38-CWR-ASH

**MOTION TO STAY PROCEEDINGS**

The United States of America respectfully requests that the proceedings in this matter be stayed for a period of ninety (90) days, to include the briefing and ruling on any pending motions.

On February 21, 2025, the magistrate judge issued an opinion denying four search warrants for cell tower data in relation to various service providers. *See* Doc. No. 6. On March 4, 2025, the government submitted a motion for an extension of time requesting an additional fourteen days to file a motion to reverse or vacate the magistrate judge’s order. *See* Doc. No. 7. On March 5, 2025, the Court granted the government’s motion and extended the filing deadline to March 21, 2025. *See* Doc. No. 8. The government is requesting a stay of the proceedings to provide additional time to determine whether it will seek review of the magistrate judge’s order pending on this docket.

“The district court has the inherent power to control its own docket, including the power to stay proceedings.” *Datatreasury Corp. v. Wells Fargo & Co.*, 490 F. Supp. 2d 749, 754 (E.D. Tex. 2006) (quoting *Soverain Software LLC v. Amazon.com, Inc.*, 356 F.Supp.2d 660, 662 (E.D. Tex. February 9, 2005)). Moreover, “[t]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Id.* (quoting *Landis v. N. Am. Co.*, 299 U.S. 248 (1936)). The government’s request for a stay is not sought for the purpose of delay, and the government, in good faith, believes that a stay is necessary to assess whether to pursue further

review. As no other party is currently involved in this matter, there is no opposition to this request nor will there be any prejudice.

Accordingly, the United States respectfully requests a stay of ninety (90) days of the proceedings in this matter, including all briefing and ruling on motions. The United States requests any other relief the Court deems appropriate.

Respectfully submitted,

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