UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

American Library Association, et al.,

Plaintiffs,

v.

Case No. 1:25-cv-01050

Keith Sonderling, et al.,

Defendants.

JOINT MOTION FOR ENTRY OF A BRIEFING SCHEDULE

In light of the government's reopening, the parties hereby jointly move for the entry of the briefing schedule proposed below, which only memorializes the extension provided in Judge Boasberg's November 13, 2025, Standing Order No. 25-59. The parties do not seek to modify the default 53-day extension.

Plaintiffs filed this litigation on April 7, 2025, ECF No. 1 to challenge the Defendants' dismantling of the Institute of Museum and Library Services (IMLS). Plaintiffs subsequently moved for a preliminary injunction on April 10, 2025, ECF No. 13, which the court denied the preliminary injunction on June 6, 2025. Plaintiffs moved for summary judgement on September 5, 2025, ECF No. 58. Per the scheduling order in effect at that time, Defendants' brief was due October 3, 2025. The government shutdown began on October 1, 2025, and, per this Court's standing order, D.D.C. S. O. No. 25-55 (Oct. 1, 2025), the government's brief due date was stayed.

Now that the government has reopened, the parties propose the following briefing schedule, in accordance with the standing order's timing requirements. Plaintiffs request that the Court enter the following modified briefing schedule:

- On or before November 25, 2025: Defendants' combined opposition, cross-motion for summary judgment, and motion to dismiss due;
- On or before December 16, 2025: Plaintiffs' combined reply and response to Defendants' cross-motion for summary judgment and motion to dismiss due;
- On or before December 30, 2025: Defendants' reply in support of their cross-motion for summary judgment and motion to dismiss due.

The deadlines proposed in this schedule reflect extensions of the deadlines that would follow from standard operation of Local Civil Rule 7, affording adequate time to brief this challenge. A proposed order is attached.

For the foregoing reasons, the parties request that the Court adopt the proposed briefing schedule.

Dated: November 18, 2025

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