

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

American Library Association, et al.,

Plaintiffs,

v.

Keith Sonderling, et al.,

Defendants.

Case No. 1:25-cv-01050

**JOINT MOTION FOR AN EXTENSION OF
THE REMAINDER OF THE BRIEFING SCHEDULE**

The parties in this case jointly move to extend the remainder of the briefing schedule in this case while the parties engage in settlement negotiations. The parties respectfully request that the Court extend the deadline by 60 days to April 20, 2026 for Plaintiffs' combined reply in support of their motion for summary judgment and in response to Defendants' cross-motion for summary judgment and motion to dismiss, after which Defendants will have until May 4, 2026 to file their reply in support of their cross-motion for summary judgment and motion to dismiss.

Plaintiffs filed this litigation on April 7, 2025 (ECF No. 1) to challenge Defendants' dismantling of the Institute of Museum and Library Services (IMLS). Plaintiffs moved for summary judgment September 5, 2025, and defendants responded on November 25, 2025, with a cross-motion for summary judgment and motion to dismiss. Plaintiffs sought an extension for time to file their combined reply on December 5, 2025, setting the new due dates for Plaintiffs' combined reply brief to February 17, 2026, and Defendants' reply to March 3, 2026. The parties now seek leave to extend the remaining deadlines by 60 days.

The parties seek this extension in good faith as they have begun to engage in negotiations regarding a potential settlement. The parties agree that an extension of 60 days is necessary to discuss the terms of such a resolution and obtain the requisite supervisory approval of any such resolution. The extension of time will minimize the burden on the Court's and the parties' resources while the parties negotiate.

Under the current schedule set by this Court on December 11, 2025, Plaintiffs' combined response and reply is due February 17, 2026, and the Defendants' reply is due two weeks later on March 3, 2026. Plaintiffs respectfully request that the Court enter the following modified briefing schedule:

- On or before April 20, 2026: Plaintiffs' combined reply and response to Defendants' cross-motion for summary judgment and motion to dismiss due
- On or before May 4, 2026: Defendants' reply in support of their cross-motion for summary judgment and motion to dismiss due

A proposed order is attached.

Dated: February 10, 2026

/s/ Pooja A. Boisture

Pooja A. Boisture (NY Bar No. 5104559)*
Orlando Economos (DC Bar No.
90013791)
Kayla M. Kaufman (DC Bar No.
90029091)
Robin F. Thurston (DC Bar No. 1531399)
Skye Perryman (DC Bar No. 984573)
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 448-9090
pboisture@democracyforward.org
oeconomos@democracyforward.org
kkaufman@democracyforward.org
rthurston@democracyforward.org
sperryman@democracyforward.org

/s/ Chris Gair

Chris Gair (Ill. Bar No. 6190781)*
Vilia Dedinas (Ill. Bar No. 6191614)*
John Gallo (Ill. Bar No. 6193988)*
Ingrid Yin (Ill. Bar No. 6339857)*
Gair Gallo Eberhard LLP
1 E. Wacker Drive, Suite 2600
Chicago, IL 60601
(312) 600-4900
cgair@gairgallo.com
vdedinas@gairgallo.com
jgallo@gairgallo.com
iyin@gairgallo.com

Counsel for Plaintiffs

* Admitted *pro hac vice*