

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Cook County, Illinois,
et al.,

Plaintiffs,

v.

Chad F. Wolf, in his official capacity as Acting
Secretary of U.S. Department of Homeland
Security,

et. al.,

Defendants.

Case No. 19-cv-6334

Judge Gary Feinerman

Motion for Stay of Proceedings Pending Appeal

Defendants respectfully move the Court to stay proceedings in this matter pending appeal of the Court's preliminary injunction order. For the reasons discussed in Defendants' Memorandum in Opposition to ICIRR's Request for Supplemental Discovery and in Support of Motion for Stay of Proceedings, this Court should stay the proceedings in this matter pending resolution of Defendants' appeal. Defendants provided advanced notice to Plaintiffs of this motion, and propose that the parties utilize the pre-existing discovery briefing schedule, *see* ECF No. 104, to address Defendants' Motion to Stay Proceedings and discuss the same during the next conference currently scheduled for January 22, 2020.

Dated: December 5, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

ALEXANDER K. HAAS
Director, Federal Programs Branch

/s/ Kuntal Cholera

ERIC J. SOSKIN

KERI L. BERMAN

KUNTAL V. CHOLERA

JOSHUA M. KOLSKY, DC Bar No. 993430

U.S. Dept. of Justice, Civil Division,

Federal Programs Branch

1100 L Street, N.W., Rm. 12002

Washington, DC 20001

Phone: (202) 305-8645

Fax: (202) 616-8470

Email: kuntal.cholera@usdoj.gov

Counsel for Defendants