

**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 Interlocutory Appeal Certification and Stay of Discovery

Defendants respectfully move the Court to (i) certify its Opinion and Order (ECF No. 150) for interlocutory appeal pursuant to 28 U.S.C. § 1292(b), and (ii) stay discovery authorized under the Court's Opinion and Order (ECF No. 150). For the reasons discussed in Defendants' Memorandum in Support of Defendants' Motion for Interlocutory Appeal and Motion to Stay Discovery, the Court should grant this Motion. ICIRR informed Defendants that ICIRR opposes these motions.

Dated: June 16, 2020

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