

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT FRANKFORT

Electronically filed

COMMONWEALTH OF KENTUCKY, et. al.

Plaintiffs

v.

JOSEPH R. BIDEN in his official capacity as
President of the United States, *et. al.*

Defendants

Civil Action No. 3:21-cv-
00055-GFVT

**PLAINTIFFS’ NOTICE OF INTENT TO RESPOND TO DEFENDANTS’
EMERGENCY MOTION FOR STAY PENDING APPEAL AND FOR
IMMEDIATE EMERGENCY STAY**

The Court granted Plaintiffs’ motion for a preliminary injunction on Tuesday, November 30, 2021. [R. 50.] After waiting more than three full business days—and without any advance notice to Plaintiffs—the Defendants filed a self-styled “emergency motion” for a stay *after* the close of business on Friday. [R. 53.] Plaintiffs believe a response within the same three-business-day timeframe is appropriate and therefore intend to file a response no later than Wednesday, December 8, 2021. The Plaintiffs will, however, meet any court-ordered deadline.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that on December 4, 2021, the above document was filed with the CM/ECF filing system, which will electronically serve a copy to all counsel of record.

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