

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RYDIE, *et al.*,

Plaintiffs,

v.

BIDEN, *et al.*,

Defendants.

No. 8:21-cv-2696

Judge Deborah Chasanow

JOINT MOTION TO STAY DISTRICT COURT PROCEEDINGS PENDING APPEAL

The parties jointly and respectfully request that the Court stay further proceedings in this case pending Plaintiffs' appeal of the denial of their motion for a preliminary injunction. *See Rydie v. Biden*, No. 21-2359 (4th Cir.). Conducting further proceedings in this Court while overlapping issues are under consideration by the U.S. Court of the Appeals for the Fourth Circuit would result in largely duplicative parallel proceedings and create the risk of inconsistent decisions. Conversely, a stay of proceedings would promote efficiency, conserve judicial and party resources, and permit the parties and the Court to receive the benefit of the Fourth Circuit's reasoning in any further proceedings. Accordingly, this Court should exercise its discretion to temporarily stay district court proceedings during the pendency of the Fourth Circuit appeal. The parties further suggest that they file a proposed schedule for further proceedings within 14 days of the entry of a mandate by the Fourth Circuit. A proposed order is attached to this joint motion.

December 15, 2021

/s/ Jonathan Bolts
JONATHAN BOLLS (MD Bar #14110)
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Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ISRAEL RYDIE, *et al.*,

Plaintiffs,

v.

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

Defendants.

Civil Action No. DKC 21-2696

[PROPOSED] ORDER

Upon consideration of the parties' Joint Motion to Stay District Court Proceedings Pending Appeal, IT IS HEREBY ORDRED that the Motion is GRANTED. All proceedings in this matter are stayed pending the U.S. Court of Appeals for the Fourth Circuit's resolution of Plaintiffs' appeal of the denial of their motion for a preliminary injunction. The parties are directed to file a joint status report proposing a schedule for further proceedings within 14 days of the entry of a mandate by the Fourth Circuit.

DATE: _____

DEBORAH K. CHASANOW
United States District Judge