

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	No. 4:16-cv-00180-CDP
	)	
Plaintiff,	)	JUDGE CATHERINE D. PERRY
	)	
v.	)	
	)	
THE CITY OF FERGUSON,	)	
	)	
Defendant.	)	
	)	
_____	)	

**MOTION FOR STAY**  
**IN LIGHT OF LAPSE OF APPROPRIATIONS**

The United States of America hereby moves for a stay of the Conference Call scheduled for October 2, 2025, and the Status Hearing scheduled for October 7, 2025, in the above-captioned case.

1. At the end of the day on September 30, 2025, the continuing resolution that had been funding the Department of Justice expired and those appropriations to the Department lapsed. The Department does not know when such funding will be restored by Congress.

2. Absent an appropriation, Department of Justice attorneys are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice therefore requests a stay of the Conference Call scheduled for October 2, 2025, and the Status Hearing and scheduled for October 7, 2025, until Congress has restored appropriations to the Department.

4. If the Court grants this motion for a stay, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department.

5. Opposing counsel has authorized counsel for the United States to state that the City has no objection to this motion.

Therefore, although the United States greatly regrets any disruption caused to the Court, other litigants, and the public, the United States hereby moves for a stay of the Conference Call scheduled for October 2, 2025, and the Status Conference scheduled for October 7, 2025, in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Dated: October 1, 2025

Respectfully Submitted,

/s/ Jeffrey R. Murray  
JEFFREY R. MURRAY (Maryland Bar)  
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Civil Rights Division  
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*Attorney for the United States*

**CERTIFICATE OF SERVICE**

I certify that on October 1, 2025, I electronically filed the foregoing using the Court's CM/ECF System, which will send notice of the filing to counsel of record.

/s/ Jeffrey R. Murray