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Via CM/ECF and Federal Express

December 12, 2017

Chambers of the Honorable Marvin J. Garbis
United States District Judge
U.S. District Court for the District of Maryland
101 West Lombard Street
Chambers 5C
Baltimore, MD 21201

Re: Briefing Schedule on Defendants' Motion for Clarification and Partial Stay of Preliminary Injunction (ECF No. 91) in *Stone, et al. v. Trump, et al.*, Case 1:17-cv-02459-MJG

Dear Judge Garbis:

Plaintiffs respectfully oppose the extremely expedited schedule proposed by Defendants in their Motion for Clarification and Partial Stay of Preliminary Injunction (ECF No. 91).¹ Defendants filed this Motion today at 2:27 p.m., three weeks after the Court's Order issuing a preliminary injunction. Despite having sat on their hands during this intervening period, Defendants insist that the Court issue its decision by 12:00 p.m. this Thursday. This schedule is unreasonable, unjustified, and unnecessary. Plaintiffs request that they be allowed to file their opposition by **5:00 pm on Friday, December 15, 2017.**

Defendants informed Plaintiffs' counsel of their intent to file this Motion today, and rejected Plaintiffs' suggestion that the parties agree to a briefing schedule that would permit Plaintiffs to file their opposition by close of business this Friday, December 15.

Defendants' failure to file this Motion in a timely manner is particularly striking in light of the fact that they filed substantively identical pleadings in the related District of Columbia litigation: a motion for clarification on November 22, and a motion for partial stay of preliminary injunction on December 6. *Doe v. Trump*, No. 17-cv-1597 (CKK) (D.D.C.). Defendants attached to their Motion in this case the *very same* declaration as the one that accompanied their motion for partial stay in *Doe*. There is no reason they could not have filed earlier.

¹ Plaintiffs do oppose the Motion for Clarification and Partial Stay of Preliminary Injunction (ECF No. 91), and will file a brief explaining the grounds upon which the Court should deny the Motion. This immediate request is for a reasonable briefing schedule on which to submit the opposition.

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To the extent that Defendants' request is urgent, the urgency is of their own making. Plaintiffs respectfully ask that the Court impose a reasonable, while still expedited, briefing schedule on Defendants' Motion for Clarification and Partial Stay of Preliminary Injunction (ECF No. 91), with Plaintiffs' opposition to Defendants' Motion due at 5:00 p.m. on Friday, December 15.

Sincerely,

/s/ Marianne Kies

/s/ Mitch Kamin

(signed by M. Kies,
with permission of M. Kamin)

Attorneys for Plaintiffs

cc: All Counsel of Record, via CM/ECF