

Multiple Documents

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2	Proposed Order

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

DEMOCRATIC PARTY OF VIRGINIA and
DCCC,

Plaintiffs,

v.

ROBERT H. BRINK, in his official capacity as the
Chairman of the Board of Elections; JOHN
O'BANNON, in his official capacity as Vice Chair
of the Board of Elections; JAMILAH D.
LECRUISE, in her official capacity as the
Secretary of the Board of Elections; and SUSAN
BEALS, in her official capacity as the
Commissioner of the Department of Elections,

Defendants,

v.

REPUBLICAN PARTY OF VIRGINIA,

Intervenor-Defendant.

Civil Action No. 3:21-CV-756-HEH

JOINT MOTION FOR STAY OF PROCEEDINGS

The Parties in the above-captioned case, by and through counsel, jointly move this Court for an order staying this matter until June 30, 2022 and continuing all current deadlines during that time while the Parties engage in settlement negotiations. During the Court's May 31, 2022 Telephone Conference, the Court referred this case to Judge Elizabeth Hanes for settlement negotiations. Given the Parties' willingness to engage in settlement negotiations and work towards a settlement in good faith, a stay in this matter and a continuation of the current deadlines is warranted. Such a stay will conserve both the Court's and the Parties' resources.

If this joint motion is granted, the Parties will provide the Court with an update regarding the status of the settlement negotiations on June 15, 2022, and a final update on or before June 30, 2022.

Dated: June 1, 2022

Respectfully Submitted:

/s/ Aria Branch

/s/ Joshua N. Lief

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CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all parties.

/s/ Aria Branch

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REPUBLICAN PARTY OF VIRGINIA,

Intervenor-Defendant.

Civil Action No. 3:21-CV-756-HEH

**[PROPOSED] ORDER GRANTING
JOINT MOTION FOR STAY OF PROCEEDINGS**

This matter is before the Court on the Parties' Joint Motion for Stay of Proceedings. For good cause shown, this motion is GRANTED. The proceedings in this matter are stayed until June 30, 2022. The Parties must provide the Court with an update on the status of settlement negotiations on June 15, 2022, and the Parties must provide the Court with a final update on the status of settlement negotiations on or before June 30, 2022.

IT IS SO ORDERED this ____ day of _____, 2022.

Henry E. Hudson
Senior United States District Court Judge