

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

HISTORY ASSOCIATES INCORPORATED,

Plaintiff,

v.

U.S. SECURITIES AND EXCHANGE COMMISSION,

Defendant.

No. 1:24-cv-1858-ACR

**MOTION FOR STAY OF OCTOBER 8, 2025 STATUS CONFERENCE  
DUE TO LAPSE OF APPROPRIATIONS**

Defendant U.S. Securities and Exchange Commission (“SEC” or “Commission”) hereby moves for a stay of the October 8, 2025 status conference currently scheduled in this case. As explained below, a stay of that status conference is necessary due to a lapse in funding.

1. On September 18, 2025, the Court ordered the parties to appear for a status conference on or before November 12, 2025. After conferring with the Court’s Courtroom Deputy, on September 25, the parties informed the Court’s Courtroom Deputy that they were available for a status conference on October 8, 2025. On September 30, the Court entered a notice stating that the status conference was set for October 8.

2. At the end of the day on September 30, 2025, the appropriations act that had been funding the SEC expired, and appropriations to the Commission lapsed. The Commission does not know when funding will be restored by Congress.

3. Absent an appropriation, SEC staff, including 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.

4. Undersigned counsel for the SEC therefore requests a stay of the status conference currently scheduled for October 8, 2025 until Congress has restored appropriations to the SEC.

5. This is the SEC's first request to reschedule an appearance before the Court. If this motion for a stay of the status conference is granted, no existing court-ordered deadlines in this case will be affected. Indeed, the Court's order that the parties appear for a status conference stated that the status conference should occur on or before November 12, 2025. Undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Commission. The Commission requests that, at that time, the parties will contact the Courtroom Deputy to re-schedule the status conference.

6. Pursuant to Local Civil Rule 7(m), undersigned counsel discussed this motion with Plaintiff's counsel via email on September 30, 2025. Plaintiff's counsel informed undersigned counsel that Plaintiff will oppose this motion.

Therefore, although the SEC greatly regrets any disruption caused to the Court and other litigants, the Commission hereby moves for a stay of the October 8, 2025 status conference until after the Commission attorneys are permitted to resume their usual civil litigation functions.

Dated: October 1, 2025

Respectfully submitted,

/s/ Alexandra Verdi

Alexandra Verdi

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*U.S. Securities and Exchange Commission*

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**[PROPOSED] ORDER**

Having considered the defendant U.S. Securities and Exchange Commission's ("SEC")  
opposed motion to stay the October 8, 2025 status conference,

IT IS HEREBY ORDERED that the October 8, 2025 status conference is stayed until  
Congress has restored appropriations to the SEC.

SIGNED on this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Hon. Ana C. Reyes  
UNITED STATES DISTRICT JUDGE