

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

OIL & GAS WORKERS ASSOCIATION,

Plaintiff,

v.

JOSEPH R. BIDEN, JR., *et al.*,

Defendants.

Case No. 2:24-cv-00646

Hon. Judge James D. Cain, Jr.

Hon. Magistrate Judge Thomas P. LeBlanc

JOINT MOTION TO STAY

In accordance with the Court’s November 15, 2024 order, *see* ECF No. 18, the parties submit this joint motion to stay the district court proceedings. The parties agree that staying these proceedings will preserve party and judicial resources because this case will likely become moot.

The Court’s power to stay litigation is “incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936). When considering a motion to stay, courts consider three factors: (1) potential prejudice to any party; (2) hardship and inequity if the action is not stayed; and (3) preservation of judicial resources. *See, e.g., Kerr Mach. Co. v. Vulcan Indus. Holdings, LLC*, No. 6-20-CV-00200-ADA, 2021 WL 1298932, at *1 (W.D. Tex. Apr. 7, 2021). Here, staying this litigation will not prejudice any party. The parties agree a stay is appropriate and will result in no prejudice because (a) the parties’ resources will be preserved by a stay, and (b) the preliminary injunction in *Louisiana v. Biden* preserves the status quo. A stay will also preserve the Court’s resources. If it grants a stay, the Court will likely avoid adjudicating administrative record and summary judgment disputes that will likely become moot in a matter of months.

If the Court grants the parties' requested stay, the parties will submit a joint status report no later than April 1, 2025, where the parties will either inform the Court that the matter is moot or that they need to recommence this litigation.

For the foregoing reasons, the parties respectfully request that the Court stay these proceedings until April 1, 2025.

Dated: December 12, 2024

Respectfully submitted,

TODD KIM
Assistant Attorney General
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/s/ J. Scott Thomas
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