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NEETA THAKUR, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, et al.,

Defendants.

Case No. 3:25-cv-4737

**JOINT STATEMENT REGARDING
DISCOVERY AND
ADMINISTRATIVE MOTION TO
AMEND SCHEDULE**

1 The Parties submit the joint statement and motion to update the Court on the status of the
2 *Thakur* discovery period and seek an extension of that discovery period to facilitate resolution of
3 negotiations.

4 The discovery period in this matter began on January 30, 2026, pursuant to a scheduling
5 order of the Court. Scheduling and Stay Order, ECF No. 183.

6 On February 28, 2026, Plaintiffs indicated an intent to seek more than 10 depositions.
7 Following a meeting of the Parties, Plaintiffs then served interrogatories and requests for
8 production on DOE on March 6, 2026. Plaintiffs served further interrogatories and requests for
9 production on NSF, NEH, EPA, DOD, DOT, and HHS-NIH on March 17. Defendants served
10 interrogatories and requests for production on the named plaintiffs related to DOE on April 2.
11 The Parties have repeatedly stipulated to extension of the deadline for responses and objections
12 (“R&Os”) as to all discovery requests to facilitate negotiation of a set of stipulations to obviate all
13 merits discovery. *See* Fed. R. Civ. P. 29(b). Presently, the Parties have agreed that the R&Os be
14 due this Friday, May 8, 2026 the last day of the discovery period. *See* ECF No. 183.

15 There is good cause for this extension. The Parties have nearly finalized stipulations as to
16 six of the seven agencies and are presently in settlement discussions as to the final agency. As
17 part of the resolution, the relevant Defendant agencies have agreed to provide signed stipulations,
18 information related to the factual stipulations, and a table of terminated grants (including various
19 grant-specific fields requested by Plaintiffs, to assist Plaintiffs with monitoring compliance with
20 the present preliminary injunctions). The Parties believe that these stipulations and tables (as well
21 as any settlement for the remaining agency) would obviate any need for merits discovery by
22 Plaintiffs as to Defendants and thus permit comprehensive and efficient resolution of the claims
23 in this litigation through forthcoming cross-motions for summary judgment. The Parties are also
24 presently working on a set of stipulations that would obviate any need for discovery served by
25 Defendants on Plaintiffs. If the Court grants the Parties’ request, the Parties stipulate that R&Os
26 for all pending discovery be due on May 22, 2026.

27 The Parties thus seek a reasonable two-week extension of the discovery period to finalize
28 the stipulations and to determine whether they are likely to reach agreement in principle, subject

1 to final approvals, on any settlement term(s). Any settlement would also require various internal
2 approvals in accordance with Department of Justice regulations as well as approval of the Court
3 pursuant to Fed. R. Civ. P. 23(e).

4 The Parties further request that the Court’s deadline to coordinate with the Parties in *State*
5 *of California v. Wright*, ECF No. 194, be extended by one additional week. There is good cause
6 for this extension request. The Parties believe that they will be best positioned to discuss
7 coordination after they are able to finalize their agreements, including as to DOE.

8 Therefore, the Parties hereby move for the discovery period in this matter to be extended
9 by two weeks, to May 22, 2026, and the deadline to coordinate with the Parties in *State of*
10 *California v. Wright* be extended by one week, to May 29, 2026. Should the Court grant this
11 extension, the Parties will continue conferring about adjustments to the briefing schedule and will
12 likely present a revised proposed schedule to the Court in short order.

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Dated: May 6, 2025

By: /s/ Anthony P. Schoenberg

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Date: May 6, 2025

By: /s/ Jason Altabet

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on May 6, 2026, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to registered parties.

Executed May 6, 2026, at San Francisco, California.

/s/ Jason Altabet

Jason Altabet