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AND JUNIPER NETWORKS, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE CO.
and JUNIPER NETWORKS, INC.

Defendants.

CASE NO. 5:25-CV-00951-PCP

**JOINT STIPULATION TO STAY CASE:
HEWLETT PACKARD ENTERPRISE CO. AND
JUNIPER NETWORKS, INC.**

Judge: P. Casey Pitts
Action Filed: January 30, 2025

Subject to the Court's approval, Plaintiff United States of America and Defendants, through their undersigned counsel of record, hereby stipulate as follows:

1. At midnight on Tuesday, September 30th, the continuing resolution that had been funding the Department of Justice expired and appropriations to the Department lapsed. The same is true for other Executive Branch agencies. The date when funding will be restored by Congress has not been established.

2. Absent an appropriation, Department of Justice attorneys and employees are prohibited from

1 working, even on a voluntary basis, “except for emergencies involving the safety of human life or the
2 protection of property.” 31 U.S.C. § 1342.

3 3. Undersigned counsel for the United States and Defendants therefore request a stay of the
4 above captioned case until Congress has restored appropriations to the Department of Justice and the
5 government shutdown ends.

6 4. If this Joint Stipulation is granted, counsel for the United States will promptly notify the
7 Court as soon as Congress has appropriated funds for the Department.

8 Therefore, although we greatly regret any disruption caused to the Court and the other litigants,
9 subject to the Court’s approval the United States and Defendants hereby jointly stipulate for a stay in
10 this case until Department of Justice attorneys are permitted to resume their usual civil litigation
11 functions.

1 Dated: October 1, 2025

/s/ Jeremy M. Goldstein

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8 Dated: October 1, 2025

/s/ Jennifer Mellott

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21 HEWLETT PACKARD ENTERPRISE CO. AND
22 JUNIPER NETWORKS, INC.
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[PROPOSED] ORDER

Pursuant to stipulation, IT IS HEREBY ORDERED THAT:

1. This case is hereby STAYED until after the shutdown of the federal government has ended and appropriations to the Department of Justice have been restored;

2. The Government will promptly notify the Court as soon as the government shutdown has ended.

IT IS SO ORDERED.

DATED: _____

HONORABLE P. CASEY PITTS
United States District Judge

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Miriam M. Arghavani, am the ECF user whose identification and password are being used to file the Joint Stipulation to Stay. In compliance with Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

/s/ Miriam M. Arghavani