

**In the United States Court of Appeals
for the District of Columbia Circuit**

NATIONAL TREASURY EMPLOYEES UNION, et al.,
Plaintiffs-Appellees,

v.

RUSSELL VOUGHT, in his official capacity as Acting Director of the
Consumer Financial Protection Bureau, et al.,
Defendants-Appellants.

On Appeal from the United States District Court
for the District of Columbia
Case No. 25-cv-0381-ABJ (The Hon. Amy Berman Jackson)

**MOTION TO EXTEND TIME TO FILE A RESPONSE TO
DEFENDANTS-APPELLANTS' MOTION TO MODIFY THE STAY
PENDING APPEAL, FOR A LIMITED REMAND, AND TO PLACE THE
APPEAL IN ABEYANCE**

The plaintiffs-appellees, National Treasury Employees Union, et al., respectfully request a 7-day extension of time to file their response to the motion to modify the stay pending appeal up to and including April 17, 2026. The current deadline under Fed. R. App. Procedure 26(a)(3) is April 10, 2026. This is the plaintiffs-appellees' first request for an extension of time for their response to this motion. The defendants-appellants take no position on this request. There is good cause for this request, as follows:

Appellate counsel for the plaintiffs-appellees have several existing obligations that will take up substantial time over the next two weeks. First, some members of counsel's team have obligations for the Easter and Passover holidays in the next week. Additionally, counsel have a number of existing court deadlines and oral arguments scheduled over the next two weeks. Specifically, counsel for the plaintiffs-appellees have:

- A motion for summary judgment in the Superior Court of California in *Kaufman v. First American Title Insurance Co.*, No. BC382826, due today;
- A hearing on a motion for class certification in the Superior Court of California in *Wilmot v. First American Title Insurance Co.*, No. BC370141, on April 3;
- A brief in opposition to a petition for certiorari due in the United States Supreme Court in *Nwauzor v. GEO Group*, No. 25-828, on April 10;
- An oral argument in the Washington Court of Appeals in *Danielson v. Seattle Children's Hospital*, No. 877933, on April 10;
- An opening brief due in the Seventh Circuit in *Xu Lun v. Milwaukee Electrical Tool Corporation*, No. 25-3347, on April 10;
- A reply brief due in the Tenth Circuit in *Shaffer v. Toyota*, No. 25-6115, on April 13;

- A reply brief due in the United States Supreme Court in *Operating Engineers Trust Fund of Washington, D.C. v. United States*, No. 25A628, on April 16; and
- A reply brief due in the Eighth Circuit in *MMIC v. OB/GYN*, No. 25-1758, on April 16.

Counsel for the defendants-appellants has informed us that they take no position on this request. No prejudice will result to either party by the granting of the requested extension.

For the foregoing reasons, the plaintiffs-appellees respectfully request a 7-day extension of time to file and serve their brief, to and including April 17, 2026.

Respectfully submitted,

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April 1, 2026

Counsel for Plaintiffs-Appellees

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), I hereby certify that my word processing program, Microsoft Word, counted 376 words in the foregoing motion, exclusive of the portions excluded by Federal Rule of Appellate Procedure 32(f). The document also complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6) because it was prepared in proportionally spaced typeface in 14-point Baskerville font.

/s/ Jennifer Bennett
Jennifer Bennett

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2026, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. Court of Appeals for the District of Columbia Circuit by using the CM/ECF system. All participants are registered CM/ECF users and will be served by the CM/ECF system.

/s/ Jennifer Bennett
Jennifer Bennett