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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

FRIENDS OF ANIMALS,

Petitioners,

v.

DOUG BURGUM, et al.,

Respondents.

Civil No. 2:25-cv-204-KHR (Lead)

AM. WILD HORSE CONSERVATION, et al.,

Petitioners,

v.

DOUG BURGUM, et al.,

Respondents.

Civil No. 2:25-cv-212-KHR (Joined)

JOINT MOTION TO VACATE DEFAULT BRIEFING DEADLINES AND STAY PROCEEDINGS FOR 60 DAYS

Petitioners and Respondents (collectively, “the Parties”) jointly and respectfully request that the Court vacate the default briefing deadlines for this case and stay proceedings in the above-referenced case for 60 days, through May 10, 2026. Good cause exists for this request because the Parties presently anticipate that further litigation in this case may be unnecessary. Pursuant to Local Civil Rule 7.1(b)(1)(A), the Parties conferred regarding this motion and now move jointly.

On September 2, 2025, Petitioners, Friends of Animals, filed their complaint challenging the decision of the U.S. Bureau of Land Management (“BLM”) to gather wild horses on herd management areas in a region commonly referred to as the Wyoming Checkerboard. On September 10, 2025, Petitioners, American Wild Horse Conservation et al., filed suit challenging the same. On January 26, 2026, the Court consolidated the two cases.

At this time, Respondents do not anticipate they will gather wild horses pursuant to the decision challenged in these cases this fiscal year. Accordingly, in the interest of judicial economy and the Parties’ interest in avoiding further litigation, the Parties now seek a 60-day stay, until May 10, 2026, to allow the Parties additional time to determine whether further litigation is necessary. The requested stay may avoid the need to expend the parties’ and the Court’s resources on unnecessary filings. *Landis v. North American Co.*, 299 U.S. 248, 255 (1936) (“[T]he power to stay proceedings is incidental to the power inherent in every court to

control the disposition of the cases on its docket with economy of time and effort for itself, for counsel, and for litigants.”).

NOW THEREFORE, the Parties respectfully request that the Court enter an order as follows:

1. All proceedings in the above-captioned litigation are stayed until May 10, 2026.
2. The default briefing deadlines pursuant to Local Civil Rule 83.6(c) are hereby vacated.
3. Respondents shall promptly notify the Court if BLM changes its intention not to conduct a wild horse gather pursuant to the challenged decision during the current fiscal year. Any such notification shall be provided at least 60 days before any proposed gather is scheduled to occur.
4. No later than May 10, 2026, the Parties will file a joint status report updating the Court on the status of the case and advising the Court whether it is necessary to extend the stay or proposing next steps for proceedings in the case.

Dated: March 11, 2026

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