

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

*In re:*

*Application of the Reporters Committee for  
Freedom of the Press for an Order Authorizing  
the Release of Grand Jury Material Cited,  
Quoted, or Referenced In the Report of Special  
Counsel Robert S. Mueller III*

Case: 1:19-mc-00045  
Chief Judge Beryl A. Howell

**JOINT MOTION TO STAY**

Pursuant to the Court's Minute Order dated April 1, 2019, counsel for the government and the Reporters Committee for Freedom of the Press (the "Reporters Committee") have met and conferred regarding a proposed briefing schedule. The parties jointly agreed to and hereby do move the Court to stay the entry of a briefing schedule on the Reporters Committee's Application for 30 days, subject to requests to renew the stay further, in light of the anticipated release of the redacted Special Counsel's Report and any filing of a petition for rehearing or rehearing *en banc* in *McKeever v. Barr*, No. 17-5149 (D.C. Cir. 2018), events that will inform the legal and factual circumstances of this proceeding.

The parties respectfully reserve the right to request that this Court lift the stay at any time and to propose a briefing schedule.

Dated: April 9, 2019

Respectfully submitted,

/s/ Elizabeth J. Shapiro

ELIZABETH J. SHAPIRO  
U.S. DEPARTMENT OF JUSTICE  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, DC 20530  
(202) 514-5302  
Fax: (202) 616-8470  
Email: Elizabeth.Shapiro@usdoj.gov

JONATHAN IAN KRAVIS  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-6886  
Email: jonathan.kravis3@usdoj.gov

/s/ Theodore J. Boutrous

THEODORE J. BOUTROUS  
DC Bar No. 420440  
THEANE EVANGELIS (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, California 90071-3197  
(213) 229.7000  
tboutrous@gibsondunn.com

AMIR C. TAYRANI  
DC Bar No. 490994  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
(202) 955.8500  
atayrani@gibsondunn.com

LEE R. CRAIN (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York City, New York  
(212) 351.2454  
lcrain@gibsondunn.com

BRUCE D. BROWN  
D.C. Bar No. 457317  
KATIE TOWNSEND  
D.C. Bar No. 1026115  
THE REPORTERS COMMITTEE FOR  
FREEDOM OF THE PRESS  
1156 15<sup>th</sup> St. NW, Suite 1020  
Washington, D.C. 20005  
Phone: 202.795.9300  
Facsimile: 202.795.9310  
bbrown@rcfp.org  
ktownsend@rcfp.org

*Counsel for Applicant the Reporters  
Committee for Freedom of the Press*