

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ADRIENNE ROCKENHAUS,

Plaintiff,

Civil No. 25-12736

v.

Honorable Linda V. Parker  
Magistrate Judge Kimberly G. Altman

STYLIANOS AGAPIOU, United  
States Probation Officer; JEFFRY  
KONAL, Supervising United States  
Probation Officer; DION THOMAS,  
Deputy Chief United States Probation  
Officer, JOHN DOE,

Defendants.

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**EX PARTE MOTION AND BRIEF FOR A STAY OF CASE IN LIGHT OF  
LAPSE OF APPROPRIATIONS**

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The U.S. Attorney's Office moves for a stay of the above-captioned case and in support states:

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice expired, and appropriations to the Department lapsed. The Department does not know when funding will be restored by Congress.
2. Absent an appropriation, United States attorneys are prohibited from working, even on a voluntary basis, except in very limited circumstances,

including “emergencies involving the safety of human life of the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the United States therefore requests a stay of this case until Congress has restored appropriations.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds. The Government requests that, at that point, all current deadlines for the parties, including the parties’ responsive pleading deadlines, be extended commensurate with the duration of the lapse in appropriations.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government moves for a stay of this case until United States attorneys are permitted to resume their usual civil litigation functions.

Respectfully submitted,

JEROME F. GORGON JR.  
UNITED STATES ATTORNEY

/s/ Benjamin A. Anchill  
BENJAMIN A. ANCHILL (P70968)  
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Dated: October 20, 2025

*Attorney for the United States*

**Certification of Service**

I certify that on October 20, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system.

In addition, I certify that Molly Anderson, Legal Assistant assigned to the Civil Defensive Litigation Unit of the United States Attorney's Office, sent the foregoing via U.S. mail on October 20, 2025, to the following:

Adrienne Rockenhaus  
35560 Grand River Ave. 244  
Farmington Hills, MI 48335

/s/ Benjamin A. Anchill  
BENJAMIN A. ANCHILL