

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

CHRIS VAN HOLLEN,

Plaintiff,

v.

FEDERAL ELECTION COMMISSION,

Defendant.

and

CENTER FOR INDIVIDUAL FREEDOM,

Defendant

and

HISPANIC LEADERSHIP FUND,

Defendant

Civil Action No. 1:11-cv-00766 (ABJ)

MOTION FOR STAY PENDING APPEAL

Pursuant to Rule 8(a)(1)(A) of the Federal Rules of Appellate Procedure Intervenor-Defendant Hispanic Leadership Fund (“HLF”) hereby moves this Court for an Order staying the Court’s judgment of May 30, 2012, pending appeal to the United States Court of Appeals for the District of Columbia Circuit and the rendering of a decision by the appellate court.

Defendant CFIF does not oppose this motion. Defendant Federal Election Commission has not yet determined its position on this motion. Plaintiff Representative Van Hollen opposes this motion. A memorandum in support of this motion and proposed order are attached.

Dated: April 5, 2012

Respectfully submitted,

Holtzman Vogel Josefiak PLLC

By: /s/ Jason Torchinsky

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