

**United States Court of Appeals
District of Columbia Circuit**

333 Constitution Avenue, NW Washington, DC 20001-2866
Phone: 202-216-7000 | Facsimile: 202-219-8530

Sai
Petitioner

v.

Case Number: 14-1005

United States Postal Service (USPS)
Respondent

Motion for stay pending review

On June 23rd, the Court upheld *per curiam* panel order 1492737 on *per curiam* reconsideration, and denied reconsideration *en banc*.

As this is a final order — for me to comply with it in either direction would prevent reviewability of the matter — I respectfully request that the Court grant a stay of that order sufficient for me to file review with the Supreme Court (i.e. 90 days from the *en banc* denial, plus 60 days if an application for extension of time is granted, plus time for consideration of *certiorari* if granted). I will notify the Court if the Supreme Court grants me an extension of time to file for *certiorari*.

I request that stay be granted on the same terms detailed in my previous request [1496875], i.e. that the case continue in the interim, with an agreement that I will pay

the filing fee if review is denied.

I believe that I am harmed by USPS' failure to timely provide the documents I requested, and further delay would exacerbate that harm. However, because the issue of constitutional right to *both* privacy and equal access to the courts is a stronger matter of principle to me, if the Court is unwilling to proceed until this matter is resolved, then in the alternative I respectfully request that the entire proceedings be stayed pending review.

As my fee status is itself the matter at issue for review, I respectfully request that the Court waive, or in the alternative stay, its fee for notice of review.

Respectfully submitted¹,
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Certificate of service

I hereby certify that on June 27, 2014, I filed this paper via the Court's CM/ECF system, through which the respondent is registered and will be served.

¹ As I have been denied relief from paper filing, I will try to mail the 4 paper copies of this motion promptly, as required by the Court's rules. However, as I am currently out of the country, it may take some time to reach the Court.