

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

<b>GREGORY T. ANGELO, ET AL.</b>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 22-cv-1878 RDM
	)	
<b>DISTRICT OF COLUMBIA, ET AL.</b>	)	
	)	
Defendants.	)	
_____	)	

**CONSENT MOTION TO ESTABLISH PROCEDURAL DATES AND MEMORANDUM  
OF POINTS AND AUTHORITIES IN SUPPORT THEREOF**

Plaintiffs, by counsel, move this court to set procedural dates concerning the amendment of Plaintiffs’ complaint in this case and Defendants’ response thereto. Defendants consent to grant of this motion.

Plaintiffs and Defendants have conferred with respect to their intended course of action in this proceeding. Defendants have advised Plaintiffs they intend to file a motion to dismiss the complaint in this proceeding and Plaintiffs have advised Defendants they intend to file an amended complaint. To avoid expending unnecessary private and public resources in litigating a motion to dismiss the present complaint which will likely be superseded by an amended complaint, the parties have agreed and request the court to order the following schedule:

Plaintiffs shall have until February 1, 2023 to file an amended complaint.

Defendants shall have until March 3, 2023 to file their response to any amended complaint or if no amended complaint is filed, then to file their response to the existing complaint.

Should Plaintiffs renew their motion for a preliminary injunction, Defendants will have 60 days from the date such renewed motion is filed to respond. Plaintiffs will then have 30 days to reply to Defendant’s’ response. While any motion for preliminary injunction is pending,

Defendants' answer to the amended complaint shall be deferred pending the Court's decision on such motion.

Good cause exists to grant of this motion as it will avoid unnecessary expenditure of public and private resources in litigating a motion to dismiss which will likely be superseded by an amended complaint. No party will be prejudiced by grant of this motion since Defendants consent to its grant.

Accordingly, Plaintiffs ask that this motion be granted. A proposed order is submitted concurrently herewith.

Respectfully submitted

**GREGORY T. ANGELO**

**TYLER YZAGUIRRE**

**ROBERT M. MILLER**

**CAMERON M. ERICKSON**

By: /s/ George L. Lyon, Jr.  
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*Attorneys for Plaintiffs*

Dated: January 10, 2023

***CERTIFICATE OF SERVICE***

I, George L. Lyon, Jr., a member of the bar of this court, certify that I served the foregoing document on all counsel of record for Defendants via the court's ECF system, on or before the 10th day of January, 2023.

/s/ George L. Lyon, Jr., DC Bar 388678