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

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BRIAN WRENN, et al., Plaintiffs, v. DISTRICT OF COLUMBIA, et al., Defendants. Case No. 15-CV-162-FJS

## REQUEST FOR EXPEDITED CONSIDERATION

Pursuant to Local Civil Rule 65.1(d), Plaintiffs request expedited consideration of this motion within 21 days or earlier, following Defendants' opposition. Expedited consideration is warranted for three reasons.

First, as averred to in the brief supporting the motion, Plaintiffs are suffering irreparable harm in being denied the ability to defend themselves from physical injury. This is a particularly acute form of constitutional harm.

Second, the D.C. Circuit has denied Defendants' motion to hold their appeal in the related case of *Palmer* v. *District of Columbia*, No. 14-7180 in abeyance, and has scheduled Defendants' opening brief in that court for March 16. Expedited resolution of this matter will avoid the prospect of piecemeal or fractured appeals, as there would still be time to have any appeal of this Court's decision consolidated into the existing appeal without altering its briefing schedule.

Third, all of the issues to be considered in determining this motion have already been heavily litigated, and the Court has already heard arguments concerning the same. The elements of injunctive relief were considered during argument on Defendants' stay motion, and questions

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concerning the constitutionality of the current scheme were explored during arguments on the

plaintiffs' motions in Palmer.

Dated: February 6, 2015

Respectfully submitted,

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By: <u>/s/ Alan Gura</u>

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