

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GREGORY T. ANGELO, *et al.*,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, *et al.*,

Defendants.

Civil Action No. 1:22-cv-01878-RDM

DEFENDANTS' MOTION FOR EXPEDITED DISCOVERY

Defendants District of Columbia and Metropolitan Police Department Chief Robert J. Contee III move for expedited discovery related to Plaintiffs' Application for Preliminary Injunction [6]. The expedited discovery—consisting entirely of the six written requests attached to this Motion—is narrowly limited to Plaintiffs' standing and allegations of irreparable harm. Defendants require the information sought by these requests to adequately defend against Plaintiffs' emergency motion. And because Defendants seek to propound only a small number of requests, Plaintiffs will not be significantly burdened, nor will the case be unreasonably delayed, as Plaintiffs should be able to respond within the 14-day response time proposed by Defendants. Under the circumstances, expedited discovery is reasonable. Plaintiffs do not consent.

A memorandum of points and authorities and a proposed order are attached.

Date: July 14, 2022.

Respectfully Submitted,

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Attorney General for the District of Columbia

CHAD COPELAND

Deputy Attorney General
Civil Litigation Division

/s/ Matthew R. Blecher

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* Admitted to practice only in the State of New York. Practicing in the District of Columbia under the direct supervision of Matthew Blecher, a member of the D.C. Bar, pursuant to LCvR 83.2(f) and D.C. Court of Appeals Rule 49(c)(4).

RULE 7(m) CERTIFICATION

On July 13, 2022, I contacted Plaintiffs' counsel via telephone regarding this Motion.

Plaintiffs do not consent to the relief requested.

/s/ Andrew J. Saindon

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Senior Assistant Attorney General