

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

DICK ANTHONY HELLER, et al.,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, et al.,

Defendants.

Civil Action No. 1:22-cv-01894-DLF

JOINT MOTION TO STAY LITIGATION

Plaintiffs Dick Anthony Heller, Charles W. Nesby, and the Heller Foundation, and Defendants District of Columbia and Robert Conti, Chief of the Metropolitan Police Department (collectively, the Parties), jointly move to stay this litigation until October 17, 2022. The Parties are discussing settlement and need additional time to pursue a potential resolution that would avoid further litigation. To facilitate these efforts, the Parties request that the Court stay this matter until October 17, 2022, and order the Parties to submit a joint status report by October 17, 2022, updating the Court on the status of any settlement negotiations and whether a further stay of proceedings is warranted. A memorandum of points and authorities and the text of a proposed order are attached.

Date: September 14, 2022

Respectfully Submitted,

/s/ George L. Lyon, Jr.

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MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF JOINT MOTION TO STAY LITIGATION

In support of the Parties' Joint Motion to Stay Litigation (Motion), the Parties submit the following:

1. Fed. R. Civ. P. 6(b)(1)(A) and (7)(b);
2. The existence of good cause, as described in the Motion; and
3. The inherent equitable powers of the Court.

Date: September 14, 2022

/s/ George L. Lyon, Jr.
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