

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

GREGORY T. ANGELO, ET AL.

Plaintiffs,

v.

DISTRICT OF COLUMBIA, ET AL.

Defendants.

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Civil Action No. 22-cv-1878 RDM

**CONSENT MOTION TO CONSOLIDATE RESPONSE DATE FOR MOTIONS TO
DISMISS AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT
THEREOF**

Plaintiffs, by counsel, move this court to consolidate the response dates for motions to dismiss in this proceeding. Plaintiffs request that the response date for all motions to dismiss be set for April 14, 2023. Defendants consent to grant of this motion.

Currently, a response to the District Defendants' expected motion to dismiss is due on April 14, 2023. On March 1, 2023 Defendant Chief Michael L. Anzallo moved to dismiss the complaint in this proceeding with respect to him on several grounds, including sovereign immunity and standing. ECF 42. Undersigned counsel is currently out of town on travel and has additional longstanding travel and work commitments during the month of March that will make it impossible to fully answer the Chief's motion prior to April 14, 2023. Moreover Plaintiffs intend to file a consolidated response to the District's and Chief Anzallo's motions. Accordingly, setting the date for a response to both motions at April 14, 2023 will best conduce to the conservation of public and private resources.

No party will be prejudiced by grant of this motion. Counsel for District Defendants and for Chief Anzallo have indicated their consent to grant of this motion. Accordingly, good cause has been shown for grant of this motion

Accordingly, Plaintiffs ask that this motion be granted and that the response date for all motions to dismiss be set at April 14, 2023. 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: March 2, 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 via the court's ECF system, on or before the 2nd day of March, 2023.

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