

**IN THE 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. 22-cv-1878 RDM

**CONSENT MOTION TO EXTEND THE DATE TO RESPOND TO PENDING  
MOTIONS TO DISMISS TO APRIL 24, 2023, AND MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT THEREOF**

Plaintiffs, by counsel, move this court to extend the dates for their response to the pending motions to dismiss in this proceeding. Plaintiffs request that the response date be extended to April 24, 2023. All defendants consent to grant of this motion.

Currently, a response to the pending motions to dismiss in this proceeding is due on April 14, 2023. Undersigned counsel is counsel for plaintiffs in Case No. 22-cv-2256, *Hanson v. District of Columbia*. District defendants in this case are also defendants in the *Hanson* case. Currently pending before the *Hanson* court is a motion for preliminary injunction. The Court in *Hanson* has indicated an intent to schedule oral argument on the motion for preliminary injunction in that proceeding on or before April 14, 2023. Given undersigned counsel's and District counsel's conflicting schedules, April 14, 2023 appears to be the only available date for the *Hanson* argument. Preparation for the *Hanson* argument, however, will require several days undersigned counsel has allocated to preparing and finalizing the response to the pending motions to dismiss in this proceeding. Accordingly an extension of the response date in this proceeding is necessary to allow counsel adequate time to devote to the *Hanson* oral argument.

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. Thus good cause has been shown for grant of this motion

Accordingly, Plaintiffs ask that this motion be granted and that the response date for the pending motions to dismiss in this proceeding be extended to April 24, 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.  
George L. Lyon, Jr. (D.C. Bar No. 388678)  
Arsenal Attorneys  
4000 Legato Road, Suite 1100  
Fairfax, VA 22033  
202-669-0442, fax 202-483-9267  
gll@arsenalattorneys.com

Matthew J. Bergstrom (D.C. Bar. No. 989706)  
Arsenal Attorneys  
4000 Legato Road, Suite 1100  
Fairfax, VA 22033  
800-819-0608  
mjb@arsenalattorneys.com

*Attorneys for Plaintiffs*

Dated: March 20, 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 20th day of March, 2023.

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

**IN THE 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. 22-cv-1878 RDM

**ORDER**

(Proposed)

Before the Court is Plaintiffs' consent motion to extend the date for Plaintiffs' response to the pending motions to dismiss to April 24, 2023.

Good cause having been shown, the Court will grant the motion.

Plaintiffs shall have until April 24, 2023 to respond to the pending motions to dismiss their complaint.

SO ORDERED.

Dated: March \_\_\_, 2023

---

Hon. Randolph D. Moss  
District Court Judge