

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Adam Steele, Brittany Montrois, and Joseph
Henchman, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. 14-cv-01523-RCL

REPLY TO RESPONSE OF MOTLEY RICE LLC OF OCTOBER 1, 2020

The terms of the amended complaint were agreed upon by Mr. Narwold and I after roughly a month of negotiations. Soon thereafter, approximately *seven weeks* ago, Mr. Narwold began discussing with counsel for the Defendant (Mr. Williamson) whether the Defendant would consent to the filing. I was not privy to those communications. Stalling helps the Defendant. The complaint needs to be amended now in furtherance of the motion that *all* class representatives want considered (i.e. the motion for a preliminary injunction). The current motion objected to by Motley Rice is an agreed-upon pleading amendment request, not a settlement agreement.

As noted in footnote 1 of Doc. 131, if renewal language I requested to be included in the current complaint had been added (the specific prayer language I requested in 2015 asked for “a judgement declaring that tax return preparers need only apply for a PTIN once . . .,”), there would be absolutely no need for amendment to cover the renewal issue. As noted on p. 2 of Doc. 134, the current complaint may cover the matter in prayer 5, but it might not. The amendment is clearly necessary to cover future fees. The responses to the two motions I recently filed are reminiscent of the ending of *The Bridge on the River Kwai*.

Please consider the motion.

Dated: October 5, 2020

Respectfully submitted,

/s/ Allen Buckley

Allen Buckley LLC

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