

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

PLAINTIFFS' MOTION FOR LEAVE TO FILE A SUR-REPLY

The plaintiffs respectfully seek leave to file the attached sur-reply to address two new points raised in the United States' reply in support of its motion for a stay. *See Ben-Kotel v. Howard Univ.*, 319 F.3d 532, 536 (D.C. Cir. 2003) ("The district court routinely grants such motions [for leave to file a surreply] when a party is unable to contest matters presented to the court for the first time in the last scheduled pleading."); *Doe v. Exxon Mobile Corp.*, 69 F. Supp. 3d 75, 85 (D.D.C. 2014) (Lamberth, J.) (same). The parties met and conferred, and the United States neither consents to nor opposes this request.

Respectfully submitted,

/s/ William H. Narwold

MOTLEY RICE LLC

William H. Narwold
bnarwold@motleyrice.com
DC Bar No. 502352
One Corporate Center
20 Church Street, 17th Floor
Hartford, CT 06103
Telephone: (860) 882-1676
Facsimile: (860) 882-1682

Meghan S.B. Oliver
moliver@motleyrice.com
William Tinkler
wtinkler@motleyrice.com
28 Bridgeside Boulevard
Mount Pleasant, SC 29464
Telephone: (843) 216-9000
Facsimile: (843) 216-9450

GUPTA WESSLER PLLC

Deepak Gupta
deepak@guptawessler.com
Jonathan E. Taylor
jon@guptawessler.com
1735 20th Street, NW
Washington, DC 20009
Telephone: (202) 888-1741
Facsimile: (202) 888-7792

CAPLIN & DRYSDALE, CHARTERED

Christopher S. Rizek
crizek@capdale.com
One Thomas Circle, NW, Suite 1100
Washington, DC 20005
Telephone: (202) 862-8852
Facsimile: (202) 429-3301

LAW OFFICE OF ALLEN BUCKLEY LLC

Allen Buckley
ab@allenbuckleylaw.com
2802 Paces Ferry Road, Suite 100-C
Atlanta, GA 30339
Telephone: (404) 610-1936
Facsimile: (770) 319-0110

August 16, 2017

*Counsel for Plaintiffs Adam Steele, Brittany
Montrois, Joseph Henchman, and the Class*

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2017, I filed the foregoing motion for leave to file a sur-reply through this Court's CM/ECF system, and that all parties required to be served have been thereby served.

/s/ William H. Narwold
William H. Narwold