

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

**RESPONSE BY CLASS COUNSEL TO ATTORNEY ALLEN BUCKLEY'S
UNAUTHORIZED MOTION TO AMEND COMPLAINT**

Class Counsel did not authorize the filing of the Motion to Amend Complaint. ECF No. 133. For the reasons stated in Class Counsel's response to Mr. Buckley's preliminary-injunction motion, ECF No. 130, and this Court's prior Orders, ECF Nos. 38 and 126, Class Counsel requests that the Court decline to address the motion. When it first appointed Motley Rice LLC as Class Counsel, this Court ordered that "Motley Rice LLC will be responsible for the overall conduct of the litigation"—including supervising the proceedings, signing all filings on behalf of the class, and "determining the class's position in all case-related matters." ECF No. 38 at 2 at 2-3. Earlier this year, in response to a motion by Mr. Buckley, the Court reaffirmed that decision. ECF No. 126. We sincerely regret the need for the Court to consider these filings and will endeavor to prevent future such filings.

Dated: October 1, 2020

Respectfully submitted,

/s/ William H. Narwold

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*Counsel for Plaintiffs Adam Steele, Brittany
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CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2020, I electronically filed Response by Class Counsel to Attorney Allen Buckley's Unauthorized Motion to Amend Complaint through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ William H. Narwold

William H. Narwold