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,)	Civil Action No.: 1:14-cv-01523-RCL
v.)	
United States of America,) Defendant.)	

RESPONSE IN OPPOSITION OF THE PLAINTIFFS' MOTION TO FILE AMENDMENT TO PLAINTIFFS' DRAFT ORDER

Despite the Court's repeated instruction that Motley Rice, LLC is to serve as Lead Class Counsel in this action, *see* Dkt. No. 126, Allen Buckley has yet again requested to supplement Plaintiffs' filing, which is, again, devoid of any legal argument for why he would be permitted to do so. Dkt. No. 206. This time, Buckley seeks to amend the Plaintiffs' already lengthy proposed order to add a provision that amounts to an improper request to reopen discovery. *Id.* Furthermore, the United States has already provided the information Buckley requests in Cost Models corroborated with declarations, depositions, and thousands of pages of discovery. *See* Dkt. No. 171 at 3–4.

The local rules do not permit multiple briefs or proposed orders simply because Plaintiffs have retained more than one attorney for representation. LCvR 7(b). Buckley's motion provides no legal reason why the Court should grant the relief requested, citing only his ongoing grievances with Motley Rice. Therefore, the Court should deny the

Motion to File Amendment to Plaintiffs' Draft Order with Respect to its Reply in Further Support of Plaintiffs' Motion for Summary Judgment filed by Allen Buckley.

Dated: July 11, 2022

DAVID A. HUBBERT
Deputy Assistant Attorney General

/s/ Emily K. Miller EMILY K. MILLER STEPHANIE A. SASARAK JOSEPH E. HUNSADER BENTON T. MORTON Trial Attorneys, Tax Division JOSEPH A. SERGI Senior Litigation Counsel U.S. Department of Justice Post Office Box 227 Ben Franklin Station Washington, DC 20044 Telephone: (202) 307-2250 Facsimile: (202) 514-6866 Joseph.A.Sergi@usdoj.gov Joseph.E.Hunsader@usdoj.gov Stephanie.A.Sasarak@usdoj.gov Emily.K.Miller@usdoj.gov Benton.T.Morton@usdoj.gov Counsel for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that the foregoing RESPONSE was filed with the Court's ECF system on July 11, 2022, which system serves electronically all filed documents on the same day of filing to all counsel of record.

/s/ Emily K. Miller

EMILY K. MILLER Trial Attorney, Tax Division U.S. Department of Justice