

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

Plaintiffs,)

Civil Action No.: 1:14-cv-01523-RCL

v.)

United States of America,)

Defendant.)

Wallace G. Dickson, on behalf of)
himself and all others similarly)
situated,)

Plaintiff,)

Civil Action No.: 1:14-cv-02221-RCL

v.)

United States of America,)

Defendant.)

**PLAINTIFFS' MOTION FOR CONSOLIDATION
OF RELATED ACTIONS AND APPOINTMENT OF
MOTLEY RICE LLC AS INTERIM CLASS COUNSEL**

PLEASE TAKE NOTICE THAT Plaintiffs Adam Steele and Brittany Montrois, on behalf of themselves and the putative class, respectfully move the Court to consolidate the above-captioned related actions and to appoint Motley Rice LLC as Interim Class Counsel for Plaintiffs and the putative class in the proposed consolidated action under Rule 23(g). This motion is based on the accompanying memorandum and supporting exhibits.

Dated: February 5, 2015

Respectfully submitted,

By: s/ William H. Narwold

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*Attorneys for Plaintiffs Adam Steele, Brittany
Montrois, and the Putative Class*

CERTIFICATE OF SERVICE

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a member of the law firm MOTLEY RICE LLC, and my office is located at 20 Church Street, 17th Floor, Hartford, CT 06103.

On February 5, 2015, I caused to be filed the following in the above-captioned case:

PLAINTIFFS' MOTION FOR CONSOLIDATION OF RELATED ACTIONS AND APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION FOR CONSOLIDATION OF RELATED ACTIONS AND APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

DECLARATION OF WILLIAM H. NARWOLD IN SUPPORT OF PLAINTIFFS' MOTION FOR APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

DECLARATION OF DEEPAK GUPTA IN SUPPORT OF PLAINTIFFS' MOTION FOR APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

DECLARATION OF CHRISTOPHER S. RIZEK IN SUPPORT OF PLAINTIFFS' MOTION FOR APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

DECLARATION OF ALLEN BUCKLEY IN SUPPORT OF PLAINTIFFS' MOTION FOR APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR CONSOLIDATION OF RELATED ACTIONS AND APPOINTMENT OF MOTLEY RICE LLC AS INTERIM CLASS COUNSEL

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing, and by email upon the following

counsel of record for the plaintiff in *Dickson v. United States of America*, No. 1:14-cv-02221-RCL

(D.D.C.):

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 5, 2015

Respectfully submitted,

By: s/ William H. Narwold

William H. Narwold
MOTLEY RICE LLC