

**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

MOTION TO BE NAMED SOLE LEAD CLASS COUNSEL

For the reasons set forth in the memorandum submitted with this motion, Allen Buckley LLC motions to be named sole lead class counsel in the above-captioned case.

In the event this motion is granted, the undersigned will be responsible for, and will ensure that it or co-counsel handle, the following tasks:

- a. Supervising all pretrial, trial and post-trial proceedings;
- b. Signing all pleadings, motions, briefs, discovery requests, or objections and responses, and any subpoenas or notices;
- c. Determining and presenting the position of the plaintiff class as to all matters that arise during pretrial, trial, and post-trial proceedings through motions, briefs, oral argument, or in any other manner as may be appropriate;
- d. Designating attorneys for appearances at court conferences;
- e. Implementing procedures to ensure deadlines are met and unnecessary expenditures of time and funds are avoided;
- f. Organizing meetings of counsel where appropriate; and

- g. Delegating tasks and otherwise coordinating the work activities of all plaintiffs' counsel, and performing any other such duties Lead Class Counsel deems appropriate or as the Court may order.

Respectfully submitted,

/s/ Allen Buckley

Allen Buckley LLC

LAW OFFICE OF ALLEN BUCKLEY LLC

Allen Buckley
ab@allenbuckleylaw.com
2727 Paces Ferry Road, Suite 750
Atlanta, GA 30339
Telephone: (678) 981-4689
Facsimile: (855) 243-0006

January 23, 2020

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