

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
MICHIGAN WELFARE RIGHTS)	
ORGANIZATION, <i>et al.</i>)	
)	
<i>Plaintiffs,</i>)	
)	No. 1:20-cv-3388-EGS
v.)	
)	
DONALD J. TRUMP, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
_____)	

**RNC’S RESPONSE TO PLAINTIFFS’ MOTION FOR CLARIFICATION
AND STATEMENT OF POINTS AND AUTHORITIES**

Plaintiffs wonder whether they have leave to amend their complaint. *See* Mot. for Clarif. (ECF No. 52) 1. But they have not filed a *motion* asking this Court for leave to amend their complaint; nor have they complied with the Local Rules, which require them to attach “an original of the proposed pleading as amended.” LCvR 7(i). Until the RNC sees Plaintiffs’ proposed amendments, they cannot take a position on whether Plaintiffs are entitled to leave (or whether their motion is, for example, futile). This Court should not grant Plaintiffs leave to amend until they comply with the rules and properly move for that relief. This Court should disregard Plaintiffs’ nearly ten additional pages of arguments for why they should be allowed to amend, as those substantive points do not belong in a motion that purports to seek mere clarification of ministerial questions.

Plaintiffs also wonder whether they need to wait to seek leave to amend their complaint until after this Court resolves their remaining claim. *See* Mot. for Clarif. 1. The RNC does not oppose this Court clarifying that Plaintiffs can wait to seek leave to amend their complaint until after the Court has ruled on their 42 U.S.C. §1985(3) claim.

Dated: June 1, 2022

Respectfully submitted,

/s/ David A. Warrington
David A. Warrington (1616846)
Harmeet K. Dhillon
Mark P. Meuser
Gary M. Lawkowski (VA125)
DHILLON LAW GROUP INC.
2121 Eisenhower Avenue, Suite 402
Alexandria, VA 22314
(415) 433-1700
dwarrington@dhillonlaw.com
harmmeet@dhillonlaw.com
mmeuser@dhillonlaw.com
glawkowski@dhillonlaw.com

Tyler R. Green (982312)
Cameron T. Norris (VA083)
Patrick N. Strawbridge
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tyler@consovoymccarthy.com
cam@consovoymccarthy.com
patrick@consovoymccarthy.com

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I e-filed this response via ECF, which will email everyone requiring notice.

Dated: June 1, 2022

/s/ David A. Warrington

RETRIEVED FROM DEMOCRACYDOCKET.COM