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July 21, 2016

VIA ECF

The Honorable George Levi Russell, III
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, MD 21201

Re: *M.A.B. ex rel. L.A.B. & L.F.B. v. Bd. of Educ. of Talbot County, et al.*
Case No. GLR-16-2622

Dear Judge Russell:

I am writing with the consent of Edmund O'Meally, counsel for Defendants, in the hope of scheduling expedited briefing and a hearing on Plaintiff's Motion for Preliminary Injunction (ECF 7), so that the motion can be resolved in advance of August 10, which is the start of the school athletics season to which the preliminary injunction motion relates. Mr. O'Meally and I have conferred and we jointly request that Defendants' opposition to the motion for preliminary injunction be due on Thursday, July 28, 2016 and that Plaintiff's reply, if any, be due on Friday, July 29, 2016.

We would respectfully request that the Court conduct a hearing on the motion in the week of August 1. A hearing on Tuesday, August 2 or Wednesday, August 3 would be ideal for all parties, but we will be able to attend a hearing any date that week on which the Court can accommodate us. Unless the Court would find live testimony helpful in consideration of the issues, we do not anticipate presenting witnesses at the hearing.

If Your Honor would prefer to resolve scheduling of a hearing by phone, Mr. O'Meally and I would both be available at the Court's convenience today (7/21) in the late afternoon (after 3:00 pm), or any time tomorrow (7/22).

Thank you for your consideration of this request for expedited proceedings. For the Court's convenience, I have enclosed a proposed order. Please do not hesitate to contact me if you have any concerns or questions regarding this submission. I can be reached at (410) 625-5428 x13.

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Hon. George Levi Russell, III

July 21, 2016

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Respectfully submitted,

FREESTATE JUSTICE, INC.



Jer Welter

Deputy Director & Managing Attorney

Encl.

cc: Edmund J. O'Meally, Esq. (via email to esomeally@pklaw.com)
Counsel for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

**M.A.B., a minor,
by and through his parents and next friends,
L.A.B. and L.F.B.,**

Plaintiff,

v.

**BOARD OF EDUCATION OF TALBOT
COUNTY, et al.,**

Defendants.

Civil Action No. **GLR-16-2622**

ORDER

In light of the parties' joint correspondence of July 21, 2016, the following schedule will govern the briefing and hearing of Plaintiff's Motion for Preliminary Injunction (ECF 7):

- Defendants' response in opposition due: **July 28, 2016**
- Plaintiff's reply, if any, due: **July 29, 2016**
- A hearing on the motion will be held on August _____, 2016 at _____ a.m. / p.m. in Courtroom _____ of the Garmatz Federal Courthouse, 101 W. Lombard St., Baltimore, MD 21201.

SO ORDERED, this _____ day of July, 2016.

George Levi Russell, III
United States District Judge